

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

RAYMOND T. BALVAGE and DEBORAH
A. BALVAGE, husband and wife; et al.,

Plaintiffs,

vs.

RYDERWOOD IMPROVEMENT AND
SERVICE ASSOCIATION, INC., a
Washington non-profit corporation,

Defendant.

NO. 3:09-cv-05409 BHS

DECLARATION OF ALICIA B. PIERCE IN
SUPPORT OF DEFENDANT RYDERWOOD
IMPROVEMENT AND SERVICE
ASSOCIATION, INC.'S MOTION FOR
SUMMARY JUDGMENT

I, Alicia B. Pierce, declare the following facts to be true:

1. I am a paralegal employed by BETTS, PATTERSON AND MINES, P.S., Counsel for the Defendant in this matter, the Ryderwood Improvement and Service Association, Inc., hereinafter "RISA".

2. I am over the age of 18, competent to testify to the matters set forth herein and make this declaration of my own personal knowledge and belief.

3. On or about November 12, 2012, Defendant RISA propounded Interrogatories and Request for Production of Documents to each of the individual Plaintiffs. Forty-five Plaintiffs answered the discovery requests, two (Jeannette H. Headen and Gerald Blair Kolb) have not.

DECLARATION OF ALICIA B. PIERCE
IN SUPPORT OF DEFENDANT RISA'S
MOTION FOR SUMMARY JUDGMENT
Case No. 3:09-cv-05409 BHS

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4. I have reviewed all 29 discovery responses produced to date, which include the responses of Plaintiffs: Joyce Marie Adams; Luvern Harland Allen and Miriam Margaret Kennedy Allen; James Alvin Baker and Darla Jean Baker; Raymond T. Balvage and Deborah A. Balvage; Sharon Marie Banta; Ralph Alvin Barfell, Jr.; Janie Kay Bodine; Richard Anthony Braga, Jr. and Margaret Louise Braga; Charles Thomas Caldwell and Sandi Kay Caldwell; Karen Campbell; Laren Willbur Coleman and Pamela Denise Coleman; Alvin Dee Colpitts and Corabelle Colpitts; Betty Gene Donoghue; Joyce Elaine Fischer; Glenn Richard Huestis and Carol Nadine Huestis; Barbara Jean Joy; Alfred Wesley Leach and Gloria Eileen Leach; Raymond Ernest Morris and Carolyn L. Morris; Barbara Louise Pepper, Bob Pistone and Doris Pistone; Vern Powell and Sharon Powell; Charles John Santineau; Don Smith and Diane Smith; Donald Neil Stroud and Sharon Lee Stroud; Charles E. Weaver and Susan M. Weaver; Walter Gordon West and Janet Marie West; Beverly White; and Bob and Diane White.

5. Attached as Exhibits hereto are the discovery responses produced by the Plaintiffs:

- **Exhibit 1** is a true and correct copy of the discovery responses produced by Plaintiff Joyce Marie Adams.
- **Exhibit 2** is a true and correct copy of the discovery responses produced by Plaintiffs Luvern Harland Allen and Miriam Margaret Kennedy Allen;
- **Exhibit 3** is a true and correct copy of the discovery responses produced by Plaintiffs James Alvin Baker and Darla Jean Baker;
- **Exhibit 4** is a true and correct copy of the discovery responses produced by Plaintiffs Raymond T. Balvage and Deborah A. Balvage;
- **Exhibit 5** is a true and correct copy of the discovery responses produced by Plaintiff Sharon Marie Banta;
- **Exhibit 6** is a true and correct copy of the discovery responses produced by Plaintiff Ralph Alvin Barfell, Jr.;

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- 1 • **Exhibit 7** is a true and correct copy of the discovery responses produced by
2 Plaintiff Janie Kay Bodine;
- 3 • **Exhibit 8** is a true and correct copy of the discovery responses produced by
4 Plaintiffs Richard Anthony Braga, Jr. and Margaret Louise Braga;
- 5 • **Exhibit 9** is a true and correct copy of the discovery responses produced by
6 Plaintiffs Charles Thomas Caldwell and Sandi Kay Caldwell;
- 7 • **Exhibit 10** is a true and correct copy of the discovery responses produced by
8 Plaintiff Karen Campbell;
- 9 • **Exhibit 11** is a true and correct copy of the discovery responses produced by
10 Plaintiffs Laren Willbur Coleman and Pamela Denise Coleman;
- 11 • **Exhibit 12** is a true and correct copy of the discovery responses produced by
12 Plaintiff Alvin Dee Colpitts and Corabelle Colpitts;
- 13 • **Exhibit 13** is a true and correct copy of the discovery responses produced by
14 Plaintiff Betty Gene Donoghue;
- 15 • **Exhibit 14** is a true and correct copy of the discovery responses produced by
16 Plaintiff Joyce Elaine Fischer;
- 17 • **Exhibit 15** is a true and correct copy of the discovery responses produced by
18 Plaintiffs Glenn Richard Huestis and Carol Nadine Huestis;
- 19 • **Exhibit 16** is a true and correct copy of the discovery responses produced by
20 Plaintiff Barbara Jean Joy;
- 21 • **Exhibit 17** is a true and correct copy of the discovery responses produced by
22 Plaintiffs Alfred Wesley Leach and Gloria Eileen Leach;
- 23 • **Exhibit 18** is a true and correct copy of the discovery responses produced by
24 Plaintiffs Raymond Ernest Morris and Carolyn L. Morris;
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- 1 • **Exhibit 19** is a true and correct copy of the discovery responses produced by
2 Plaintiff Barbara Louise Pepper;
- 3 • **Exhibit 20** is a true and correct copy of the discovery responses produced by
4 Plaintiff Bob Pistone and Doris Pistone;
- 5 • **Exhibit 21** is a true and correct copy of the discovery responses produced by
6 Plaintiffs Vern Powell and Sharon Powell;
- 7 • **Exhibit 22** is a true and correct copy of the discovery responses produced by
8 Plaintiff Charles John Santineau;
- 9 • **Exhibit 23** is a true and correct copy of the discovery responses produced by
10 Plaintiffs Don Smith and Diane Smith;
- 11 • **Exhibit 24** is a true and correct copy of the discovery responses produced by
12 Plaintiffs Donald Neil Stroud and Sharon Lee Stroud;
- 13 • **Exhibit 25** is a true and correct copy of the discovery responses produced by
14 Plaintiffs Charles E. Weaver and Susan M. Weaver;
- 15 • **Exhibit 26** is a true and correct copy of the discovery responses produced by
16 Plaintiffs Walter Gordon West and Janet Marie West;
- 17 • **Exhibit 27** is a true and correct copy of the discovery responses produced by
18 Plaintiff Beverly White;
- 19 • **Exhibit 28** is a true and correct copy of the discovery responses produced by
20 Plaintiff Bob White;
- 21 • **Exhibit 29** is a true and correct copy of the discovery responses produced by
22 Plaintiff Diane White.

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6. Interrogatory Nos. 3 and 5¹ asks each Plaintiff to identify all acts of retaliation claimed in this case. Collectively, the Plaintiffs allege over 500 acts of retaliation. However only eight out of the 500 acts alleged are common to most of the Plaintiffs. These eight acts include the following:

- Filed improper liens on their real property without any legal authority and based on claims for services and benefits which were never performed;
- Interfered and influenced Community Waste and Recycling to suspend garbage services to all non-members;
- Threatened to or posted the names and account balances of individuals who were delinquent in paying their dues on the community bulletin board;
- Posted non-trespassing signs indicating that non-RISA members were not allowed to use RISA community property such as the park, library and community center;
- Allowed non-dues paying individuals to be shunned by neighbors and residents in the RISA community and subject to various threats and harassment;
- Allowed editorials containing negative remarks about non-dues paying individuals to be published in the local newspaper;
- Permitted Pastor William Bowlby of the Ryderwood Community Church to make disparaging remarks about non-paying members of RISA during his sermons.
- Imposed an illegal policy requiring that no one house in Ryderwood could be sold to anyone less than 55 years of age which made it extremely difficult for Plaintiffs to sell their home and decreased the value of their home.

7. Although most of the allegations are unique to the couples or individuals who responded to RISA's discovery requests, Plaintiffs' claims can be grouped as follows: (a) Claims against RISA and current or former RISA board members; (b) Claims against residents of Ryderwood and third parties; (c) Claims for allegations that occurred before this litigation began in July 2009; and (d) Miscellaneous allegations made by the Plaintiffs.

¹ The Whites' discovery responses regarding their alleged retaliation claims summarized in this Declaration are found throughout their discovery responses and not just in response to Interrogatory Nos. 3 and 5.

8. **Claims Against RISA and RISA Board Members.** I reviewed all of the discovery responses produced by the Plaintiffs. The chart below includes the allegations made by each Plaintiff regarding their specific claims which appear to be as an entity against RISA and RISA Board Members.

No.	Plaintiff(s)	Allegations
1.	All Plaintiffs	Sally Gene DeBriac and other members of the RISA Board filed improper liens on my real property without any legal authority and based on claims for services and benefits which were never performed or provided.
2.	All Plaintiffs except for Bob and Diane White ²	RISA imposed an illegal policy of requiring that no house in Ryderwood could be sold to anyone who was less than 55 or anyone in their household was less than 55. This policy was advertised in the town and told to all real estate agents. These policies prevented and made it extremely difficult for me to see our home, and it also decreased the market value of our home since there was this illegal limitation placed on my ability to sell our home.
3.	Adams, Joyce Marie	RISA threatened us by posting our name and address and my account on their company bulletin board open to the public. See Names and Addresses Ryderwood Resignation Letters.
4.	Adams, Joyce Marie	RISA Selective Enforcement of Bylaw 55+. During the pendency of this case I am intimidated and compelled to follow the bylaw of 55+ to live in Ryderwood, while others were allowed to live in Ryderwood under the age of 55+.
5.	Adams, Joyce Marie	RISA during the pendency of this case breached contract by the violating the RISA bylaws: Non HOPA compliant status; Practiced selective enforcement.
6.	Adams, Joyce Marie	RISA prior to and during the pendency of this case interfered with the collection of my garbage.
7.	Adams, Joyce Marie	RISA during the pendency of this case threatened me by sending a letter to Community Waste & Recycling telling them to stop picking up my garbage.
8.	Adams, Joyce Marie	RISA during the pendency of this case threatened me by changing the community signs from residents and their guest to RISA members only.

² Joyce Adams included this response in her Answer to Interrogatory No. 6.

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No.	Plaintiff(s)	Allegations
9.	Adams, Joyce Marie	RISA during the pendency of this case member/owner board of directors intimidated and threatened me by posting of SWIFFT FREE ZONE sign at the entry of the cafe.
10.	Adams, Joyce Marie	RISA prior to and during the pendency of this case breached contract by the violating the RISA bylaws: Non HOPA compliant status; Practiced selective enforcement.
11.	Adams, Joyce Marie	Donald Barnes, Sally Gene DeBriar, Donald Zifka board members/owners posted a flyer TO THE RESIDENTS OF RYDERWOOD to harass and intimidate me.
12.	Adams, Joyce Marie	Donald Barnes Board of Directors member/owner at RISA during the pendency of this case sent me a harassing letter with a threat to proceed with collection activity and to place a Lien on my property.
13.	Allen, Luvern Harland & Miriam Margaret Kennedy	David E. Nelson, Attorney for RISA, during the pendency of this case, filed suit in Superior Court on their behalf in March 2012, against me for having tenants that were under 55 years of age, in violation of their Bylaws. I suffered great emotional turmoil because of this.
14.	Allen, Luvern Harland & Miriam Margaret Kennedy	David E. Nelson, Attorney for RISA, sent me a provocative and intimidating letter in June 2011 regarding the under-age occupants living in my rental property. This action caused us great levels of undue stress and anxiety.
15.	Allen, Luvern Harland & Miriam Margaret Kennedy	RISA interfered with the sale of our house by filing a non-statutory lien on the property February 2010, for services that have been denied.
16.	Allen, Luvern Harland & Miriam Margaret Kennedy	RISA, during the pendency of this case, changed the signs on common areas from "Residents and Guests" to "RISA Members Only, thus restricting our movement throughout the community, while still attempting to bill us for these services.
17.	Allen, Luvern Harland & Miriam Margaret Kennedy	We have been denied access to Federal food programs, as well as other programs for seniors, by RISA, during the pendency of this case. The functions, classes and programs are held in the Community Hall, of which we are prohibited from using.
18.	Allen, Luvern Harland & Miriam Margaret Kennedy	RISA wrongfully has and does deny us entrance to a public store/cafe, during the pendency of this case, because of our non-membership status. RISA does not own the store/cafe or the property it is on.
19.	Allen, Luvern Harland & Miriam Margaret Kennedy	In March 2010 RISA sent us intimidating and ominous letters threatening a possible \$100.00 per day fine for Bylaw violations for having residents under 55 years of age living in the house I own.

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No.	Plaintiff(s)	Allegations
20.	Allen, Luvern Harland & Miriam Margaret Kennedy	RISA sent me a letter in April 2010 that they were assessing a \$10.00 per day fine for "Violation - Rental of Property" because my house at 302 Taylor Street was not owner occupied, as they say is required by law.
21.	Allen, Luvern Harland & Miriam Margaret Kennedy	We received a letter from RISA's attorney David Nelson, attempting to enforce their Bylaws and discriminatory housing practices. They had been informed that I "might be in the process of selling" our rental house to the current tenant, who was under 55 years old at that time. This letter, dated June 8, 2011, caused us to cancel a potential sale. RISA's interference in our real estate transaction caused us grief and hardship, as well as financial loss.
22.	Allen, Luvern Harland & Miriam Margaret Kennedy	RISA, prior to and during the pendency of this case, threatened us with fines and by sending bills for services never provided or performed.
23.	Allen, Luvern Harland & Miriam Margaret Kennedy	RISA, during the pendency of this case, threatened and harassed us while demanding payment of money without specifying or itemizing what they were billing us for.
24.	Allen, Luvern Harland & Miriam Margaret Kennedy	In December 2009 RISA board/owners, publicly humiliated us by posting our account information, on public display, on their company bulletin board.
25.	Allen, Luvern Harland & Miriam Margaret Kennedy	RISA filed non-statutory liens on our properties in February 2010, after they had been told by Judge Putka, Cowlitz County small claims court, not to pursue any further action until the Federal Court case ended.
26.	Baker, James Alvin & Darla Jean	Prospective buyers discouraged by RISA, controlling the sale of property.
27.	Baker, James Alvin & Darla Jean	On December 7, 2009, RISA posted a Customer Balance Summary with our name posted on the bulletin board for all to see.
28.	Baker, James Alvin & Darla Jean	During the pendency of this case, RISA posted NO TRESPASSING RISA MEMBERS ONLY signs denying access to the common areas.
29.	Baker, James Alvin & Darla Jean	During the pendency of this case, RISA posted SWIFFT FREE ZONE sign in restaurant denying access to the restaurant.

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No.	Plaintiff(s)	Allegations
30.	Baker, James Alvin & Darla Jean	On April 7, 2010 Sally Gene DeBriar, Treasurer of RISA filed an unlawful non-statutory lien on our property for services that were not provided.
31.	Balvage, Raymond & Deborah	The RISA Board and RISA members during the pendency of this case interfered with and threatened and intimidated our freedom of Speech. We had installed a bulletin board on our fence line. Court documents were posted on the bulletin board. RISA damaged this bulletin board. Additionally, during the pendency of the case, we moved a carved Bible verse that was installed on our property for the previous six years and RISA damaged this.
32.	Balvage, Raymond & Deborah	The RISA Board issued fines against us and failed to and refused to tell us the nature of some of the fines and the amount of the fines. One of these fines was levied against us because we had exotic hens for chemical free eggs on our property, which is protected under state law. Out of nowhere, the RISA Board informed us that our fines totaled \$16,000. See documents produced with these answers to interrogatories.
33.	Balvage, Raymond & Deborah	The board of directors of the RISA during the pendency of this case interfered with our ability to get garbage service.
34.	Balvage, Raymond & Deborah	The board of directors of the RISA, during the pendency of this case coerced and intimidated us by publishing our account on their company bulletin in full public view.
35.	Balvage, Raymond & Deborah	The board of directors of the RISA during the pendency of this case coerced and interfered with our right to use the store/cafe by posting a "NO SWIFFT MEMBERS"
36.	Balvage, Raymond & Deborah	The board of directors of the RISA prior to this case changed its signs that read "for residents and their quests" to "No Trespassing" and "For RISA Members Only".
37.	Balvage, Raymond & Deborah	RISA board of directors during the pendency of this case coerced and intimidated us by restricting our freedom of movement in Ryderwood.
38.	Balvage, Raymond & Deborah	The Ryderwood Improvement and Services board of directors prior and during the pendency of this case repeatedly and with coercion fined and billed us for services not performed.
39.	Balvage, Raymond & Deborah	The Ryderwood Improvement and Services board of directors coerced us by repeatedly refusing to itemize these fines that they levy on us.
40.	Balvage, Raymond & Deborah	RISA board of directors during the pendency of this case threatened us by levying illegitimate fines on our properties for claims violations of bylaws.

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No.	Plaintiff(s)	Allegations
41.	Balvage, Raymond & Deborah	RISA board of directors threatened and intimidated us by publishing our name and personal account on their company bulletin board.
42.	Balvage, Raymond & Deborah	The Ryderwood Reporter, along with the board of Directors of the RISA prior to and during the pendency of this case threatened us by coercively publishing multiple threats, that they would file liens on properties of resigned members.
43.	Balvage, Raymond & Deborah	The board of directors of the RISA during the pendency of this case threatened to cut-off our garbage service and interfered with our ability to pay for garbage service.
44.	Balvage, Raymond & Deborah	Ryderwood Improvement and Services members and board of directors during the pendency of this case intimidate and restrict our freedom movement of its non-members by posting signs "for RISA Members Only."
45.	Balvage, Raymond & Deborah	12-12-2012, Ryderwood Improvement and Services board members, during the pendency of this case interfered by filing a lien on our property that interfered with a contract sale of that property.
46.	Balvage, Raymond & Deborah	Sally Gene DeBriac, director, board member, owner of RISA and the Board of Directors of RISA deliberately intimidated us by filing an improper non-statutory lien on our properties; even after a lower court stayed their action in an attempt to coerce us into paying their community fees.
47.	Balvage, Raymond & Deborah	Don Barnes, board member/owner of RISA prior to and during the pendency of this case threatens to lien property of non-members by publication of the Ryderwood Reporter.
48.	Balvage, Raymond & Deborah	George Long board member/owner of RISA threatened, intimidated and interfered with our renter/quest.
49.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association prevented me from attending Community Action Program, the federally funded senior lunches quiet enjoyment of Ryderwood residents by posting a RISA members only sign on the community hail building.
50.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association by posting a RISA members only sign on the community hall building keeping me from participating in the twice yearly Craft Fairs causing loss of income.
51.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association kept me from observing and taking part in birthday celebrations by posting a RISA members only sign on the community hall building.

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No.	Plaintiff(s)	Allegations
52.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association prevented my attending Wedding receptions at the community hall by placing a RISA members only sign on the building.
53.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association. Put a sign on the community hall building saying RISA members only this prevented my attending and celebrating at the Annual Christmas parties.
54.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association posted a sign on the community hall stating RISA members only this kept me from attending anniversary functions.
55.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association posted signs at the lake, WARNING RISA owned property NO TRESPASSING RISA MEMBERS ONLY.
56.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association posted signs at the park, WARNING RISA owned property NO TRESPASSING
57.	Banta, Sharon Marie	During the pendency of this case the board of Ryderwood Improvement and Service Association changed signs that stated Residents and Guest only to read WARNING ... RISA OWNED PROPERTY. . .NO TRESPASSING.. .RISA MEMBERS ONLY.
58.	Banta, Sharon Marie	During the pendency of this case, Donald Barnes, president/ board member/owner of Ryderwood Improvement and Service Association, sent me an intimidating letter about my cats that said Cowlitz County's rule was 10 or more cats I needed a kennel license. A kennel license was purchased on 7/3/08 and renewed 7/09.
59.	Banta, Sharon Marie	11/27/09 During the pendency of this case, Donald Barnes, president/board member/ owner of Ryderwood Improvement and Service Association sent a letter stating that they would be forced to take action against me if I did not stop harassing residents in Ryderwood concerning RISA and its operations there by taking away my 1st AMENDMENT TO FREE SPEECH.
60.	Banta, Sharon Marie	11/29/09 During the pendency of this case Donald Barnes, president/board member /owner of Ryderwood Improvement and Service Association requested by letter that I not interfere with the quiet enjoyment of Ryderwood residents.

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No.	Plaintiff(s)	Allegations
61.	Banta, Sharon Marie	12/7/09 During the pendency of this case, Sally Gene DeBriae, treasurer/board member/owner of Ryderwood Improvement and Service Association displayed on a public town bulletin board the customer balance summary with only non payers listed my name included.
62.	Banta, Sharon Marie	2/4/11 During the pendency of this case Donald Barnes, president/board member/owner of Ryderwood Improvement and Service Association sent a letter about trash and other material on my property stating I was out of compliant with the by-laws since I DO NOT BELONG to Ryderwood Improvement and Service Association I AM NO LONGER obligated to honor their by-laws or revisions of same.
63.	Barfell, Ralph Alvin	Ryderwood Improvement and Service Association denied garbage service to plaintiffs with no authority to do so.
64.	Barfell, Ralph Alvin	Ryderwood Improvement and Service Association is billing me for services not rendered, by posting No Trespassing signs on all their property. Preventing my usage of any and all of same.
65.	Barfell, Ralph Alvin	The by-laws have no enforcement clause. All these actions by RISA were stayed by the Cowlitz County Court RISA vs. Vern Powell [Dec 2009]
66.	Barfell, Ralph Alvin	Donald Barnes, During the pendency of this case a board member/owner of Ryderwood Improvement and Service Association sent me a intimidating letter with no authority to do so stating as follows: Dear Ralph and Sharon, This letter is to inform you about the concern from neighbors about the excess number of eats at your residence. Please take steps to correct this soon as possible. The County rules say over 10 animals constitutes a kennel and requires licensing. Our by-laws require preventing personal animals from bothering neighbors.
67.	Barfell, Ralph Alvin	Donald Barnes, President /board member/owner of Ryderwood Improvement and Service Association during the pendency of this case sent me a coercive letter restricting conversations with my neighbors as to RISA's operations, denying me freedom of speech.
68.	Barfell, Ralph Alvin	Sally Gene DeBriae, a board member/owner, during the pendency of this case, publicly posted my name, intimidating me, by disclosing a debt not owed.

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69.	Bodine, Janie Kay	In 2009, Ryderwood Improvement and Service Association ordered Community Waste and Recycling to cease all garbage collection for individuals who had resigned from the Association. Once again we appealed this decision to the Washington State Utilities and Transportation Commission, and once again the Commission ruled that Jeff Cummings of Community Waste and Recycling must pick up the garbage from any resident of Ryderwood who requests garbage collection and he must allow them to pay for such collection at the tariff rate that was approved by the Commission.
70.	Bodine, Janie Kay	Sally Gene DeBriac, Treasurer of Ryderwood Improvement and Service Association in December of 2009, posted, in full view of the public at large, on a Association owned bulletin board, my name and my account balance summary which they alleged that I owed money to the Association.
71.	Bodine, Janie Kay	RISA then collected on the above liens when my husband and I refinanced our home and then Sally gene debris refiled another lien on my home.
72.	Braga, Richard & Margaret	Board of Directors for RISA members/owners, during the pendency of this case; have prevented us from having "Senior Meals" provided by C.A.P. for the community and have blocked us from participating in the commodities program.
73.	Braga, Richard & Margaret	RISA board, during the pendency of this case harassed and discriminated us by placing No SWIFFT members" in the form of a sign, on a display, in the window of the store /café all passersby to see, denying us access to the store, cafe, post office and library.
74.	Braga, Richard & Margaret	RISA board members, during the pendency of this case, have publicly slandered, harassed and interfered with our personal life by placing our names on the community bulletin board, viewable by any person coming to the community.
75.	Braga, Richard & Margaret	RISA board members, during the pendency of this case, have harassed and intimidated us by billing us for community Services we do not receive/are denied.
76.	Braga, Richard & Margaret	Board of directors of RISA, during the pendency of this case, interfered with our garbage pick-up.
77.	Braga, Richard & Margaret	RISA board members, during the pendency of this case, have publicly slandered, harassed and interfered with our personal life by placing our names on the community bulletin board, viewable by any person coming to the community.

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No.	Plaintiff(s)	Allegations
78.	Braga, Richard & Margaret	Sally-Gene DeBriae and board members of RISA Board of Directors filed a non-statutory lien against our property during pendency of this case, after being ordered by Judge Putka, no liens or interference during the pendency of this case. This damaged our credit rating.
79.	Caldwell, Charles Thomas & Sandi Kay	RISA posted a sign stating the library was for use by "RISA Members Only". In September 2011 RISA admitted in print in the Ryderwood Reporter that they were, and had been, discriminating against non-members' use of the library and thus removed the sign.
80.	Caldwell, Charles Thomas & Sandi Kay	RISA interfered in our contract with Community Waste & Recycling for trash removal in 2009
81.	Caldwell, Charles Thomas & Sandi Kay	RISA threatened us by posting a sign stating the library was for use by "RISA Members Only" In September 2011 RISA admitted in print in the Ryderwood Reporter that they were, and had been, discriminating against non-members' use of the library and thus announced the sign had been removed.
82.	Caldwell, Charles Thomas & Sandi Kay	RISA has interfered with my home-ownership and title and used threatening means and methods to coerce Cowlitz County, the title and escrow companies within Cowlitz County, realtors & real estate brokers, appraisal services, etc., that they are a legitimate "homeowners' association" and are a "governing body" for all residents/homeowners in the Ryderwood area.
83.	Caldwell, Charles Thomas & Sandi Kay	RISA has denied us any services or the use of any community facilities, yet they have sent us bills for "dues" that they perceive we owe.
84.	Caldwell, Charles Thomas & Sandi Kay	We were not allowed to attend the funeral service of a neighbor and very long-time friend, Mary Anne Ables, in June 2012, because it was held in the Ryderwood Community Hall and we are not members of RISA and do not have access to the facilities.
85.	Caldwell, Charles Thomas & Sandi Kay	Sally Gene DeBriae, RISA Board member, in the spring of 2009 falsely told our mortgage lender that RISA had a lien on our home and furnished to them a copy of a lien for another property. There was no lien on our property from November 4, 2004 thru March 23, 2011.
86.	Campbell, Karen	On Dec. 7, 2009 RISA wrongfully posted our name on the bulletin board for dues supposedly owed to them since our resignation.
87.	Campbell, Karen	RISA has sent me billing statements during 2009 thru 2011 for services received. I have received no services from RISA and pay for garbage removal myself since I resigned.

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No.	Plaintiff(s)	Allegations
88.	Campbell, Karen	I am unable to go to the community hall to attend 55-Alive classes that they hold from time to time. This is very important to me as I am on very low income since I am alone and need to save money on car insurance. However, RISA owns the community building and has signs reading "RISA members only" therefore, use of the hall is forbidden to me.
89.	Campbell, Karen	Due to signs reading "RISA members only" posted after this case began, I have been denied the quiet enjoyment of the lake and the park by RISA.
90.	Campbell, Karen	Because of RISA signs reading "RISA members only" I have been denied the right to supplement my income at bazaars held semi-annually in the community hall. I also cannot[sic] sell items at the NEST because RISA owns the building.
91.	Campbell, Karen	On June 26, 2009, we wrote to RISA asking them to cease and desist sending collection notices. Since then, we have received statements dated 3-10-2010, 10-25-2010, 4-13-2011 and 9-28-2011.
92.	Campbell, Karen	During the pendency of this case, RISA has interfered with my grieving process after the death of my beloved companion of 31 years. This death took place at home on August 20, 2011 due to cancer.
93.	Campbell, Karen	On July 28, 2010, Sally Gene DeBriac treasurer of RISA put a non-statutory lien on my property for services the RISA did not provide. This took place at the county courthouse. I received no notice of intent to lien my property.
94.	Coleman, Laren Wilbur & Pamela Denise	On Dec. 7, 2009, RISA wrongfully posted, in full view of the public at large, on a RISA owned bulletin board, our name and our account balance summary on which they alleged that we owed money to the Association.
95.	Coleman, Laren Wilbur & Pamela Denise	We resigned from RISA on 11-19-2008. In 2009, RISA ordered Community Waste and Recycling to cease all garbage collection for individuals who had resigned from the Association. We appealed this decision to the Washington State Utilities and Transportation Commission, and once again the Commission ruled that Jeff Cummins of Community Waste and Recycling must pick up the garbage from any resident of Ryderwood who requests garbage collection and he must allow them to pay for such collection at the tariff rate that was approved by the Commission.
96.	Colpitts, Alvin Dee & Corabelle	Ryderwood Improvement and Service Association members, during the pendency of this case interfered with our use of the store/cafe by posting a "SWIFFT FREE AREA" sign inside the store denying us beneficiary use of public property.

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No.	Plaintiff(s)	Allegations
97.	Colpitts, Alvin Dee & Corabelle	The Board of Directors of the Ryderwood Improvement and Service Association, prior to this case changed the original town signs that read "For Residents and Their Guests," to now read "For RISA Members Only."
98.	Colpitts, Alvin Dee & Corabelle	Prior to and during the pendency of this case Ryderwood Improvement and Service Association interfered with non-paying residents of RISA that we could not vote in upcoming voting sessions unless our "dues" were up to date.
99.	Colpitts, Alvin Dee & Corabelle	The Board of Directors of the Ryderwood Improvement and Service Association and its Board of Directors and Members at large interfere with me (Alvin) as a veteran and my spouse to experience quiet enjoyment of our house.
100.	Colpitts, Alvin Dee & Corabelle	The Board of Directors of the Ryderwood Improvement and Service Association, prior to and during the pendency of this case posted for all to see, on public bulletin board, our account thereby coercing and intimidating us.
101.	Colpitts, Alvin Dee & Corabelle	The Ryderwood Improvement and Service Association Board of Directors prior to and during the pendency of this case continued to coerce by sending statements billing us for services which they did not perform.
102.	Colpitts, Alvin Dee & Corabelle	Don Barnes, board member/owner of Ryderwood Improvement and Services Association, and Board Members, prior to and during the pendency of this case, threatened us by writing statement in Ryderwood Reporter (newsletter) suggesting that they would file liens on our property for non-payment of fees.
103.	Colpitts, Alvin Dee & Corabelle	Sally Gene DeBriae, and the Board Members, owners, of the Ryderwood Improvement and Services Association, prior to and during the pendency of this case, intimidated us, by filing a non-statutory lien on our property, without performing any services and without proper authority.
104.	Donoghue, Betty Gene	On April 1, 2010 Ryderwood Improvement and Service Association President/member/owner sent a second letter to me that a fine of \$10.00 per day was being assessed "Until this violation is stopped". It also stated "This fee is required by our Bylaws and the Board Enforcement and Board HOPA Compliance Policies previously mailed to you". The children had already moved out of my home so I ignored the letter.

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No.	Plaintiff(s)	Allegations
105.	Donoghue, Betty Gene	In December 2009 Ryderwood Improvement and Service Association posted Customer Balance Summary” on their bulletin board, listing my name and stating an amount \$810.00. It did not indicate what the charge was for, since I was no longer a Ryderwood Improvement and Service Association member, I felt very intimidated, threatened and my privacy was breached.
106.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association interfered with my garbage pick-up in 2009. They had no right to coerce Community Waste & Recycling to withhold my services that I pay for myself.
107.	Donoghue, Betty Gene	During the pendency of this case Ryderwood Improvement and Service Association posted signs all over Ryderwood threatening and intimidating our daily enjoyment and way of life.
108.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association’s actions have prevented me from attending C.A.P. (Community Action Program) luncheons at the Community Hall since I resigned my membership. C.A.P. pays Ryderwood Improvement and Service Association for use of the Community Hall for this Federally funded program for seniors.
109.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association’s actions have prevented me from benefitting from the U.S.D.A. (United States Department of Agriculture) Surplus Commodities program that is held in the Community Hall each month. As a senior with limited income their actions have damaged my food budget.
110.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association’s actions have prevented me from benefitting from or participating in the food distribution program, sponsored and run by the Vader Assembly of God Church, held at the Ryderwood Store/Cafe.
111.	Donoghue, Betty Gene	March 17, 2010 Ryderwood Improvement and Service Association President/member/owner Don Barnes sent me a threatening, intimidating letter demanding that I “remedy this violation” or be assessed a fine of up to \$100.00 per day until the children left my home. Since they had already moved out of my home I ignored the letter.
112.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association secretary/board member/owner Sally Gene DeBriac attempted to intimidate me, in July 2012, by preventing my partner from continuing to participate in an weekly community event, which is open to the public at the Ryderwood cafe, because he was associated with me.

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No.	Plaintiff(s)	Allegations
113.	Fischer, Joyce Elaine	Ryderwood Improvement Service Association Board, prior to and during the dependency of this case, interfered with the collection of my garbage.
114.	Fischer, Joyce Elaine	Ryderwood Improvement and Service Association Board, during the pendency of this case, threatened me by changing the community signs from residents and guests to RISA members only. See signs posted by the park and the lake. Ryderwood Improvement Service Association, Board of Directors, member, owner, threatened and intimidated me by posting the SWIFFT FREE ZONE sign at the entry of the cafe.
115.	Fischer, Joyce Elaine	Ryderwood Improvement and Service Association, Board, Members, Owners, prior to and during the pendency of this case, have interfered with my right to experience the peace, joy and contentment Ryderwood alludes to.
116.	Huestis, Glenn Richard & Carol Nadine	Ryderwood Improvement and Service Association posted a sign stating the library was for use by "RISA Members Only." In the October 2011 Ryderwood Reporter, Ryderwood Improvement and Service Association's monthly newsletter, admitted in print that they were, and had been, discriminating against non-members' use of the library and thus removed the sign.
117.	Huestis, Glenn Richard & Carol Nadine	Ryderwood Improvement & Service Association, during the pendency of this case has prevented our use of public facilities, including streets and alleys.
118.	Huestis, Glenn Richard & Carol Nadine	Ryderwood Improvement & Service Association changed signs that were on community facilities from "Residents and Guests" to read "For RISA Members Only." This was intimidating and limited our freedom in the community.
119.	Huestis, Glenn Richard & Carol Nadine	The Board of Directors of Ryderwood Improvement & Service Association intimidated us by posting our names and an amount of \$900.00, on a highly visible, public, town bulletin board near the post office. It was posted in December 2009, and only "suggested" that it was for money owed to Ryderwood Improvement & Service Association.
120.	Huestis, Glenn Richard & Carol Nadine	The Board of Directors of Ryderwood Improvement & Service Association during the pendency of this case has repeatedly sent statements, claiming money owed for "services", yet refusing us access to any community facilities or activities that they provided. We have not been members since the winter of 2007 or used "community services" as they have claimed.

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No.	Plaintiff(s)	Allegations
121.	Joy, Barbara Jean	In 2009, Ryderwood Improvement and Service Association ordered Community Waste and Recycling to cease all garbage collection for individuals who had resigned from the Association. Once again we appealed this decision to the Washington State Utilities and Transportation Commission, and once again the Commission ruled that Jeff Cummings of Community Waste and Recycling must pick up the garbage from any resident of Ryderwood who requests garbage collection and he must allow them to pay for such collection at the tariff rate that was approved by the Commission.
122.	Joy, Barbara Jean	RISA owns the bridge that crosses Campbell Creek, the purpose of which is to provide access to an earthen dam. The purpose of the dam is to diverge in part Campbell Creek which forms the Lake behind the dam. My family and I have used this bridge for more than 10 years to provide access to our property which is situated below the dam. RISA has installed signs on this dam and on this bridge stating no trespassing, RISA members only, thus preventing us from accessing two thirds of our property. In addition RISA has allowed, in violation of the Army Corps of Engineers reports, both the dam and the Lake behind the dam to deteriorate to such an extent that at times of heavy rain, that our property is front from the overflow and discharge.
123.	Joy, Barbara Jean	Sally Gene DeBriac, Treasurer of Ryderwood Improvement and Service Association in December of 2009, posted, in full view of the public at large, on a Association owned bulletin board, my name and my account balance summary which they alleged that I owed money to the Association.
124.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association Board members/owners, during the pendency of this case, did interfere with our collection of garbage by telling Jeff Cummins, owner/operator of Community Waste & Recycling that he would no longer be allowed to pick up garbage from any household that is not a member of RISA, without the authority to do so.
125.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association, members/owners, threatened us by posting our name and "customer balance summary" publicly on their company bulletin board December 7, 2009. This action by Ryderwood Improvement and Service Association violated our right to privacy and may be in violation of the Fair Credit Act.

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No.	Plaintiff(s)	Allegations
126.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association Board of Directors, members/owners, during the pendency of this case, have prevented and restricted our access and usage of public space, by revising the wording posted on community signs from, "Residents and Guests" to "RISA Members Only."
127.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association Board members/owners, during the pendency of this case, continue to coerce us by billing for services, but Ryderwood Improvement and Service Association posted signs "RISA members only," which indicates we cannot use these facilities or services.
128.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association Board members/owners, during the pendency of this case, have restricted and interfered with our right to attend the federal Community Action Program (C.A.P.'s) luncheon, held in the Ryderwood Community Hall, once a week.
129.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association Board members/owners, during the pendency of this case, have restricted and interfered with our right to attend the United States Department of Agriculture program for receiving surplus commodities held in the Ryderwood Community Hall. This has strained our food budget.
130.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association's restrictions prevent us from attending the American Association of Retired Persons (AARP) driving program, "55 Alive," which can greatly reduce the cost of our auto insurance, but is held in the Ryderwood Community Hall.
131.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association Board members/owners, during the pendency of this case, have posted an intrusive and intimidating sign, "SWIFFT FREE ZONE" in the store/cafe so we are prevented from picking up commodities donated by Vader Assembly of God.
132.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association Board members/owners have blatantly continued to file non-statutory liens on properties of S.W.I.F.F.T. members, although Cowlitz County Judge Putka told Ryderwood Improvement and Service Association, in January 2010, not to file any more liens prior to the Federal Court outcome.

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No.	Plaintiff(s)	Allegations
133.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association Board of Directors, members/owners, during the pendency of this case, have created a very brutal environment for us. We now find ourselves in a very unforgiving situation. We've lost years due to RISA's actions and there is no future here for us. Our privacy has been invaded, our freedoms have been restricted, we've lost enjoyment of our home and property; there are many broken friendships and our peace of mind is gone, along with having any sense of security.
134.	Leach, Alfred Wesley & Gloria Eileen	Ryderwood Improvement and Service Association unknown members/owners, during the pendency of this case, have insulted us and restricted our freedom by posting a threatening sign in the store/cafe which reads "SWIFFT FREE ZONE."
135.	Morris, Raymond Ernest & Carolyn L.	In 2009, Ryderwood Improvement and Service Association ordered Community Waste and Recycle to cease all garbage collection for individuals who had resigned from the Association. Once again we appealed this decision to the Washington State Utilities and Transportation Commission, and once again the commission ruled that Jeff Cummings of Community Waste and Recycle must pick up the garbage from any resident of Ryderwood who request garbage collection and he must allow them to pay for such collection at the tariff rate that was approved by the Commission.
136.	Morris, Raymond Ernest and Carolyn L.	During the pendency of this case, Sally Gene DeBriac threatened to have me arrested for trespassing because I was feeding the squirrels in the Ryderwood Park.
137.	Morris, Raymond Ernest and Carolyn L.	Sally Gene DeBriac, in December of 2009, posted, in full view of the public at large, on an Association owned bulletin board, my name and my account balance summary, which the alleged that I owed money to the Association
138.	Pepper, Barbara Louse	As per posted, not allowed to use lake area, park, library.
139.	Pistone, Bob & Doris	RISA placed a non-statutory lien on our property, without proper notification, in retaliation to our resignation from the association. Even though the Cowlitz County Superior Court had issued a stay order, RISA further collaborated with Cowlitz County Title Company to collect the alleged monies owed to satisfy the lien before we could close escrow on the sale of our property in Ryderwood.

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No.	Plaintiff(s)	Allegations
140.	Pistone, Bob & Doris	<p>During the pendency of this case, RISA Board posted RISA MEMBERS ONLY signs at the community hail, the park, the library, the pond interfering with our enjoyment of life in Ryderwood as we once had known it.</p> <ol style="list-style-type: none"> We could no longer go to the cafe for a cup of coffee We could no longer enjoy the CAP lunches. We could no longer enjoy the VFW breakfast We could not attend the AARP driver training. Could no longer enjoy the health clinics held in the community hall. Could no longer attend the entertainment held from time to time in the community hall, Could no longer enjoy the exercise room. Could no longer attend Men's club. Could no longer use library. Children and grandchildren could no longer use the park. Could no longer enjoy the critters living around the lake. Could no longer attend potlucks and visit with neighbors.
141.	Pistone, Bob & Doris	Prior to and during the pendency of this case, RISA has interfered with the residency of my son, Robert A. Pistone.
142.	Pistone, Bob & Doris	Prior to and during the pendency of this case, there were others adults living in Ryderwood under the age of 55 years, Plaintiffs Bo and Janie Bodine, Plaintiff Debbie Shimmin Balvage, daughter of RISA past board President, Claudia Drake. RISA is selective in enforcement of its bylaws.
143.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association during the pendency of this case threatened me by taking us to Court to use as an example.
144.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association 2010 interfered by trying to collect the same moneys in both District and Federal Court. Judge Putka of Cowlitz County District Court stayed our case telling RISA they were to do nothing further to any of us pending the ruling in Federal Court. Don Barnes Board President/Member/Owner Ryderwood Improvement & Service Association told Judge Putka in Court they would do nothing further to intimidate us.
145.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association 2010 interfered by not following Judge Putka's ruling and filing a lien on our home at 500 Morse Street along with about 23 other liens.

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No.	Plaintiff(s)	Allegations
146.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association during the pendency of this case has coerced and continued to bill me for two houses.
147.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association 2000 intimidated me by filing a nonstatutory lien on two of our homes without notification or providing services.
148.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association Feb 2000 prior to and during the pendency of this case interfered by filing a non-statutory lien on my home at 110 6th Street West that was in Wildwood and not plat 1 Ryderwood.
149.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association prior to and during the pendency of this case coerced by filing a lien on 515 Monroe Street before I had purchased the home
150.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association threatened my credit causing me to pay high interest rates by filing liens on my properties.
151.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association during the pendency of this case interfered with my peaceful enjoyment denying me use of common areas in Ryderwood.
152.	Powell, Vern & Sharon	Sally Gene DeBriac Board Member and other Unknown Members/Owners Ryderwood Improvement & Service Association stopped Vern Powell from getting jobs in his business from people in Ryderwood by telling RISA Members not to use him causing Loss of Income and enforcing hardship on us.
153.	Powell, Vern & Sharon	Sally Gene DeBriac Board Member/Member/Owner Ryderwood improvement & Service Association in 2004 interfered by admitting the lien on 515 was a mistake and she would reverse the lien and write a note for our loan officer.
154.	Powell, Vern & Sharon	Sally Gene DeBriac Board Member/Member/Owner Ryderwood Improvement & Service Association during the pendency of this case interfered with the sale of our home.
155.	Powell, Vern & Sharon	Sally Gene DeBriac Board Member/Member/Owner Ryderwood Improvement & Service Association during the pendency of this case interfered with sale telling National City Mortgage untrue things about the house to stop the sale.
156.	Powell, Vern & Sharon	Sally Gene DeBriac Board Member/Member/Owner interfered with malice by sending a copy of a lien for another house to National City Mortgage stopping the sale.
157.	Powell, Vern & Sharon	Sally Gene DeBriac Board Member/Member/Owner Ryderwood Improvement & Service Association knew there was no lien as she had reversed it.

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No.	Plaintiff(s)	Allegations
158.	Powell, Vern & Sharon	Don Barnes Board President/Member/Owner Ryderwood Improvement & Service Association Jan 2010 had a case scheduled the following day with Marge Sommer a class member.
159.	Smith, Don and Diane	On Dec. 7, 2009, RISA wrongfully violated our privacy by posting our names on a public bulletin board. This customer balance summary was for services they alleged were provided, but were not.
160.	Smith, Don and Diane	During the pendency of this case, RISA has posted signs on all the community public areas reading RISA members only. The signs deny us the use of the property and all the useful senior events that take place there.
161.	Smith, Don and Diane	We are denied the use of the store/cafe which is a Charity 501 C-3 Trust. By plain read, the trustees of the Trust are to be current board members of RISA and the store/cafe must be open to the public at large. However, there is a sign inside the store/cafe which reads "SWIFFT Free Zone", so we are excluded.
162.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Interfered with my garbage collection
163.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Intimidated me by posting my name and amount Owed on the community bulletin board.
164.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Association interfered with my enjoyment of Community properties.
165.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Association interfered with my use of the store and cafe.
166.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Association intimidated me with threats to other plaintiffs.
167.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Association intimidated me by filing a police Report with the Lewis County Sheriff
168.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Association Interfered in the selling of my Property.

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No.	Plaintiff(s)	Allegations
169.	Weaver, Charles E. & Susan M.	In 2009, Ryderwood Improvement and Service Association ordered Community Waste and Recycling to cease all garbage collection for individuals who had resigned from the Association. Once again we appealed this decision to the Washington State Utilities and Transportation Commission, and once again the Commission ruled that Jeff Cummings Community Waste and Recycling must pick up the garbage from any resident of Ryderwood who requests garbage collection and he must allow them to pay for such collection at the tariff rate that was approved by the Commission.
170.	Weaver, Charles E. & Susan M.	In the summer of 2009, Joyce Adams plaintiff herein, provided us a copy of a HOPA affidavit for Ryderwood Improvement and Service Association, signed by Sally Gene DeBriac as president, Dander as secretary and member Norma Mueller as the notary public. The original year shown on the affidavit is 2005. The year 2005 has a single line through the 5 and is replaced with 6. See affidavit 2005-2006. This affidavit produced by Ryderwood Improvement and Service Association and signed by Sally Gene DeBriac, Terry Dander, and member Norma Mueller is a counterfeit affidavit attesting to a survey that never took place.
171.	Weaver, Charles E. & Susan M.	Sally Gene DeBriac, Treasurer of Ryderwood Improvement and Service Association, in December of 2009, posted, in full view of the public at large, on an Association owned bulletin board, my name and my account balance summary which they alleged that I owed money to the Association.
172.	West, Walter Gordon & Janet Marie	RYDERWOOD IMPROVEMENT SERVICE ASSOCIATION/ Board Members posted a notice of Customer Balance Summary with our names and money owed December 2009.
173.	West, Walter Gordon & Janet Marie	RYDERWOOD IMPROVEMENT SERVICE ASSOCIATION / Board Members posted signs stating RYDERWOOD IMPROVEMENT ASSOCIATION members only, they have interfered with us not being able to use the park, lake, store/cafe and community building.
174.	West, Walter Gordon & Janet Marie	Sally Gene DeBriac, RYDERWOOD IMPROVEMENT SERVICE ASSOCIATION/Board Member put a nonstatutory lien on our property. Jan 2010 Judge Putka (case #9S630) ordered a stay on liens.

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No.	Plaintiff(s)	Allegations
175.	White, Beverly	In 2009, Ryderwood Improvement and Service Association ordered community waste and recycle to cease all garbage collection for individuals who had resigned from the Association. Once again we appealed this decision to the Washington state utilities and transportation commission, and once again the commission ruled that Jeff Cummings of community waste and recycle must pick up the garbage from any resident of Ryderwood who request garbage collection and he must allow them to pay for such collection at the tariff rate that was approved by the commission.
176.	White, Beverly	Sally Gene DeBriac, Treasurer of Ryderwood Improvement and Service Association in December of 2009, posted, in full view of the public at large, on an Association own bulletin board, My name and my account balance summary which the alleged that I owed money to the Association
177.	White, Bob	RISA posted a list on the board for all to see divulging personal financial information of all us SWIFFT members that had not paid dues, & included our address.
178.	White, Bob	RISA also logged complaints to the fire dept. against me.
179.	White, Bob	RISA said they were charging me a penalty of some kind for having renters with kids, those letters are in their files & I turned over the originals to SWIFFT to out in my file.
180.	White, Bob	Will have to look for our resignation letter, but on the day I resigned my membership in RISA my dues were all paid up in full for the previous 9 years we lived here, yet because I almost always paid it late I was not allowed to use any RISA facilities for those 9 years even though I paid the same amount as everyone else.
181.	White, Diane	Posted on the town bulletin board of our personal financial information which essentially became a hit list from which RISA Membership was able to identify Bob & I as members of the Resigners[sic]/SWIFFT
182.	White, Diane	RISA posted our personal financial info including name address, & that we owed money to them according to them, as of the date of my resignation of our RISA membership which was outlined in a letter to RISA from their attorney at the time, I believe Frank Randolph that we could resign, that if we did we would not be required to follow any of RISA's rules, & that in his opinion they were guilty of over 50years od blatant discrimination. We have copies of those letters.

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No.	Plaintiff(s)	Allegations
183.	White, Diane	According to the HOPA the RISA is obligated to provide a certificate of compliance, they would not, so real-estate agents were reluctant to take listings, but would only list our properties as a senior community even though they had no certificate to certify it was. If we said it was & it wasn't or if we said it wasn't & it was, we were liable to the buyer.
184.	White, Diane	I have been denied use of all RISA facilities since I moved in. I was always late with my dues, & so was not afforded the use of facilities, had no right to vote, & on the day I resigned my membership I paid my dues in full, so for 9 years I paid the same thing everyone else did yet was denied any of the membership benefits, they stole my money as far as I'm concerned, I think they should give it all back to me.
185.	White, Diane	Will get printout, but RISA has been placing invalid liens on all properties all along. The liens are of the mechanics type lien for work done on real property, but no work was performed on our property but it was cheaper for them to take that course of action.
186.	White, Diane	Unable to prove their intent as to whether it was done because of the law suit, they just did it. I was ejected from a members alley way during the town sale, & was told not to step on his property until I went over & paid up my dues, who told John Mehling I wasn't paying dues, RISA had no business to do that.

9. **Claims Alleging Retaliatory Acts by RISA Board Members Acting Outside the Scope of Their Authority.** I reviewed all of the discovery responses produced by the Plaintiffs. The chart below includes claims made by the Plaintiffs that allege retaliatory acts by current or former RISA board members who were acting outside the scope of their authority.

No.	Plaintiff(s)	Allegations
1.	Adams, Joyce Marie	Ronald Mueller board member/owner of RISA during the pendency of this case in early summer of 2011 drove past me on Morse Street suddenly made a U-turn, swerved off the road with the intention to hit me, narrowly avoiding me.
2.	Adams, Joyce Marie	Ronald Mueller board member/owner of RISA during the pendency of this case with court reporter present intimidated at the deposition of Charles Weaver in Olympia, WA by placing his hands around my neck and shoulders and shaking me.

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No.	Plaintiff(s)	Allegations
3.	Adams, Joyce Marie	Ronald Mueller member/owner RISA during the pendency of this case intimidated and threatened me at the Ryderwood post office when we were talking about him coming at me with his car.
4.	Balvage, Raymond & Deborah	Sally Gene DeBriar board member/owner of RISA during the pendency of this case threatened and intimidated me (Raymond) during my deposition.
5.	Balvage, Raymond & Deborah	Ronald Mueller board member/owner of RISA during the pendency of this case threatened and intimidated me (Raymond) during my deposition.

10. Claims Against Residents of Ryderwood and Third Parties. I reviewed all of the discovery responses produced by the Plaintiffs. The chart below includes the allegations made by each Plaintiff regarding their specific claims against residents of Ryderwood and third parties such as post office employees, garbage collection workers and various newspapers.

No.	Plaintiff(s)	Allegations
1.	Adams, Joyce Marie	Michael Lodjic member/owner of RISA during the pendency of this case threatened and intimidated me by charging at me and my dog with his bike, barely missing running over me and my dog while taking a walk in Ryderwood.
2.	Adams, Joyce Marie	Member/owner RISA during the pendency of this case I was threatened in a verbal assault in a letter to Charles Weaver.
3.	Adams, Joyce Marie	Janet Barnes wife of Donald Barnes board member/owner of RISA during the pendency of this case threatened and intimidated me by article she authored.
4.	Adams, Joyce Marie	Meredith Zwiefelhofer member/owner of RISA during the pendency of this case authored and posted an article in the Viewpointdn.com/news/opinion on September 3, 2010 that intimidated me.
5.	Adams, Joyce Marie	Meredith Zwiefelhofer member/owner of RISA during the pendency of this case authored and posted article in Sisyphus this was very offensive and intimidating to me.
6.	Adams, Joyce Marie	Faye Hoxit board member/owner of RISA during the pendency of this case allowed her dog to several times threaten me and interfere with my leaving the Ryderwood post office.

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No.	Plaintiff(s)	Allegations
7.	Allen, Luvern Harland & Miriam Margaret Kennedy	Mary Von Ende, RISA member/owner, threatened and intimidated Dennis Jackson, the minor son of my tenant, by saying "You can't live in Ryderwood, it's not a town for kids!" in November 2009. Also, Mary Von Ende, RISA member/owner, verbally threatened and intimidated T. and T.L., the minor sons of my tenant, saying "You have no business living in Ryderwood!" during the spring of 2011.
8.	Allen, Luvern Harland & Miriam Margaret Kennedy	Rose Marie Gross, relief post-master of the Ryderwood Post Office, maliciously intimidated my tenant Mr. Charles Jackson, in October 2009, during the pendency of this case, by refusing him home-delivery of his mail to an existing mail box.
9.	Allen, Luvern Harland & Miriam Margaret Kennedy	RISA, during the pendency of this case, interfered and influenced Mr. Jeff Cummins, owner of Community Waste and Recycling, to suspend garbage services to all non-members. Washington Utilities and Transportation ruled this action by RISA was not legal.
10.	Allen, Luvern Harland & Miriam Margaret Kennedy	In the winter of 2011 Jan Barnes, member/owner and wife of RISA President/member/owner, verbally abused and intimidated my tenant Kari Lindsey, saying "Should you attempt to purchase property in Ryderwood, the RISA board will sue, lien and take the property from you!"
11.	Allen, Luvern Harland & Miriam Margaret Kennedy	Interference with the potential sale of my property by Jan Barnes, member/owner and wife of RISA President/member/owner, in January 2012, to prospective buyer Keri Lindsey resulted in the loss of sale of the home.
12.	Balvage, Raymond & Deborah	Bennie Grubb, member, owner, of RISA during the pendency of this case threatened my husband Raymond Balvage.
13.	Balvage, Raymond & Deborah	Bob Zwifelhofer, member, owner, of RISA during the pendency of this case threatened physical harm to my husband Raymond Balvage.
14.	Balvage, Raymond & Deborah	William Bowlby, member/owner, RISA and pastor of Ryderwood Community Church, during the pendency of this case threatened and intimidated our freedom of religion and worship.
15.	Balvage, Raymond & Deborah	Betty Raley member/owner RISA interferes with my quiet enjoyment of our properties by verbally abusing us.

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No.	Plaintiff(s)	Allegations
16.	Balvage, Raymond & Deborah	John Mansfield member/owner of RISA during the pendency of this case threatened and intimidated me at the Ryderwood post office.
17.	Balvage, Raymond & Deborah	Beverly Brass member/owner of RISA threatened and interfered with our renter/quest.
18.	Balvage, Raymond & Deborah	Betty Baker member/owner of RISA and Don Barns board member/owner of RISA interfered with our renter/quest.
19.	Banta, Sharon Marie	7/15/09 During the pending of this case, Terry Teschner a member/owner Ryderwood Improvement and Service Association advancing on me and getting in my face. This was just after my house had burned down and I lost almost everything including my cats.
20.	Banta, Sharon Marie	During the pendency of this case Sharon Mathena member/ owner of Ryderwood Improvement and Service Association interfered with my quiet enjoyment of the Dance and Social Club.
21.	Banta, Sharon Marie	9/3/10 During the pendency of this case Mederdith Zwiefelhofer member/ owner of Ryderwood Improvement and Service Association had a letter published in the Viewpoint,Tacoma Daily News. She called us part of the mad hatters tea party.
22.	Barfell, Ralph Alvin	Jeff Cummins, owner/operator of Community Waste & Recycling, during the pendency of this case, sent me a letter to inform me he was no longer allowed to pick up cans of any household that was not a member of RISA.
23.	Barfell, Ralph Alvin	Terry Teschner, a member/owner of Ryderwood Improvement and Service Association, during the pendency of this case, intimidated me at the olequa senior center in Winlock, by getting in my face and asking, "when you gonna pay your dues?"
24.	Barfell, Ralph Alvin	Clyd Zager, a member/owner, during the pendency of this case, of Ryderwood Improvement and Service Association interfered by telling me not to sit on a bench in front of the community hall, as I waited for my food commodities. A Federal food subsidized program. The bench had a sign stating, "donated to the residents of Ryderwood."
25.	Barfell, Ralph Alvin	Clyd Zager, During the pendency of this case threatened me by grabbing my shirt at the shoulder, assaulting me and restraining me from departing, as I was going to pick up my commodities.

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No.	Plaintiff(s)	Allegations
26.	Barfell, Ralph Alvin	Clyd Zager, During the pendency of this case a member/owner of Ryderwood Improvement and Service Association used a coercive statement that RISA is Ryderwood. Rendering me unable to respond. Definitely a negative head shaking experience.
27.	Barfell, Ralph Alvin	Clyd Zager, During the pendency of this case a member/owner of Ryderwood Improvement and Service Association threatened and intimidated me as I waited for my food commodity's, at the Ryderwood community hail, angrily telling me he was paying my dues. I did not belong to RISA at this time June 21st 2011 as I had resigned July 20th 2008
28.	Bodine, Janie Kay	In May of 2012 Bob Ables member/owner of Ryderwood improvement and service Association assaulted myself and a friend with a loaded gun yelling I am a friend of and I know Sally Gene debris.
29.	Braga, Richard & Margaret	Robert Ables member/owner of RISA, during the pendency of this case, threatened Janie Bodine and Betty Dupree with a firearm.
30.	Braga, Richard & Margaret	Benny Grubb of RISA member/owner, during the pendency of this case, while returning home from Glen and Carol Huestis' home, harassed and intimidated me (Richard) by shouting "Hey Dick, you still belong to that Cult Group" (SWIFFT). This angered me, which defeats the purpose for taking these walks required by my physician, as I have acquired diabetes and hypertension since moving to this community.
31.	Braga, Richard & Margaret	William Bowlby, Pastor of Ryderwood Community Church, and RISA members/owners during the pendency of this case have discriminated and interfered with our Freedom of Religion by calling the residents involved in this case "Parasites!" during his pulpit speeches, making it clear we are not welcome to attend church services, preventing us from attending church in this community.
32.	Braga, Richard & Margaret	Benny Grubb of RISA member/owner, during the pendency of this case, harassed and intimidated me (Richard) while I was taking my evening walk, as recommended by my physician, Benny Grubb shouted from his front yard "You still belong to the cult group?" (SWIFFT) This angered me, which defeats the purpose for taking these walks required by my physician, as I have acquired diabetes and hypertension since moving to this community.
33.	Braga, Richard & Margaret	John Schmitt board member/owner of RISA, during the pendency of this case, threatened to shoot SWIFFT members Alfred Leach and Deborah Balvage.

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No.	Plaintiff(s)	Allegations
34.	Caldwell, Charles Thomas & Sandi Kay	Sharon Mathena, RISA owner/member threatened us by contacting our mortgage holder, USDA Rural Home Loans, in February 2010, more than 5 months after escrow closed on our purchase, in an attempt to collect money for RISA which was not owed, for services that were never provided.
35.	Caldwell, Charles Thomas & Sandi Kay	Sharon Mathena, RISA owner/member, interfered with our mortgage in an attempt to coerce and intimidate our mortgage holder, USDA Rural Home Loans, in February 2010.
36.	Donoghue, Betty Gene	During the pendency of this case Ryderwood Improvement and Service Association members/owners Alan and Sue Wedding mounted a camera on their front porch, at 101 Monroe Street, pointing at 100 Monroe Street, my front door. This interfered with my privacy.
37.	Donoghue, Betty Gene	Attorney for Ryderwood Improvement and Service Association, Frank Randolph, conspired against me with another attorney, David Mephram, to coerce and conspire with Ryderwood Improvement and Service Association members/owners Alan and Sue Wedding, to test the validity and legal basis of the Covenants, Conditions and Restrictions that Ryderwood Improvement and Service Association has on the titles of members and non-members alike.
38.	Fischer, Joyce Elaine	Mary Von Ende, member, owner, Ryderwood Improvement Service Association, during the pendency of this case, intimidated me, while I was standing in line at the post office.
39.	Fischer, Joyce Elaine	Dave Whetzel, member, owner, Ryderwood Improvement and Service Association, during the pendency of this case, intimidated me by inferring that I was a member of a cult and that at another time and place I would not have been tolerated.
40.	Huestis, Glenn Richard & Carol Nadine	Benny Grubb, member/owner of Ryderwood Improvement & Service Association, on June 8, 2010, verbally assaulted us as we walked past his house. He began yelling loudly and snorting like a pig, repeatedly saying "Piggy, piggy, piggy, following the farmer." We could still hear him when we reached our home.
41.	Huestis, Glenn Richard & Carol Nadine	On August 13, 2010, we were leaving the post office when we heard Dolores Clayton, Ryderwood Improvement & Service Association member/owner, say "You had better watch your back in this town!" We felt threatened by her remark and went directly home.

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No.	Plaintiff(s)	Allegations
42.	Huestis, Glenn Richard & Carol Nadine	Benny Grubb, Ryderwood Improvement & Service Association member/owner, on November 10, 2010, verbally assaulted and intimidated me as I walked with my friend Darla Baker, toward her house. He was shouting, waving his arms and seemed mad. We were frightened and hurried away.
43.	Huestis, Glenn Richard & Carol Nadine	Betty Baker and Elaine Snyder, Ryderwood Improvement & Service Association members/owners, while walking stopped in front of our home and began to shouting in a nasty tone of voice "I'm glad you're selling your house". More comments were made before they laughed and walked on. This occurred on May 17, 2011.
44.	Huestis, Glenn Richard & Carol Nadine	In June 2011 Benny Grubb, Ryderwood Improvement & Service Association member/owner again began harassing me as I walked down Taylor Street, even waving his middle finger as he laughed. I was too frightened and intimidated to continue walking and returned home. We have been so intimidated and harassed by Ryderwood Improvement & Service Association and their members that we decided in October 2011 to change our mailing address to a post office box in Vader, WA, a town seven miles away. We have a 14 mile round-trip drive to get our mail, but feel much safer than going into the post office in Ryderwood.
45.	Huestis, Glenn Richard & Carol Nadine	In April 2012 John Mehling, Ryderwood Improvement & Service Association member/owner, intimidated us with his car, as we walked down Jackson Street. He was reminding us that he was back from vacation. He followed us for a bit and then took off.
46.	Huestis, Glenn Richard & Carol Nadine	On July 3, 2009, Ryderwood Improvement & Service Association member/owner John Mehling followed us from the Ryderwood post office as we went to pick up Vern and Sharron Powell at their home. He used his golf cart to threaten us, as he came alarmingly close to our vehicle, while Sharron was getting in.
47.	Leach, Alfred Wesley & Gloria Eileen	Jon Schmitt, member/owner, former board member of Ryderwood Improvement and Service Association, during the pendency of this case, did threaten to kill me (Al) and Deborah Balvage. On August 14, 2010, while we were standing along 3rd Street talking, Mr. Schmitt pulled up beside us, in his car and said, "You have a lot of f***** nerve talking in the street". (Al) approached the car and Mr. Schmitt said, "If you touch my P car, I'll blow your f***** brains out." Not knowing if he had a gun, I was terrified

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No.	Plaintiff(s)	Allegations
48.	Leach, Alfred Wesley & Gloria Eileen	Jerre Bullen, member/owner, of Ryderwood Improvement and Service Association, during the pendency of this case, expressed anger towards me (Al) and ridiculed me for resigning from Ryderwood Improvement and Service Association, calling me a "deadbeat" while I was out walking.
49.	Leach, Alfred Wesley & Gloria Eileen	Gale Huff, member/owner of Ryderwood Improvement and Service Association, during the pendency of this case, put down and belittled me (Gloria) on the phone by saying that my resigning from Ryderwood Improvement and Service Association was not right and that I was ruining the community.
50.	Leach, Alfred Wesley & Gloria Eileen	John Mahling, member/owner of Ryderwood Improvement and Service Association, during the pendency of this case, deliberately intimidated and upset us by aggressively driving his golf cart around and around our block, several times a day, glaring at us with a look of contempt and loathing.
51.	Leach, Alfred Wesley & Gloria Eileen	William Bowlby, Pastor of Ryderwood Community Church and member/owner, of Ryderwood Improvement and Service Association, while in the presence of other church board members, during the pendency of this case, deliberately condemned and chastised us for resigning from RISA,
52.	Morris, Raymond Ernest & Carolyn	During the pendency of this case, Member/owner of Ryderwood Improvements & Service Association Bob Dorgen, 511 Taylor, confronted me at the park with vulgar, outrageous language and simulating gestures. Member/owner of Ryderwood Improvements & Service Association Clyd Zager, 500 Morse, used foul language trying to intimidate me to leave the park
53.	Morris, Raymond Ernest & Carolyn	Member/owner of Ryderwood Improvements & Service Association Jesse McFarland, 200 Monroe, while driving down ally, went into his garage and brought out a piece of pipe threatened me with it.
54.	Morris, Raymond Ernest & Carolyn	Member/owner of Ryderwood Improvements & Service Association John Mehling, 200 Monroe, threatened me with a club in the alley.
55.	Morris, Raymond Ernest & Carolyn	An unknown member of Ryderwood Improvement and Service Association cut off the head of one of the wild rabbits that I routinely fed and through its decapitated carcass against our garage door.

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No.	Plaintiff(s)	Allegations
56.	Pistone, Bob & Doris	During the pendency of this case, in February of 2012, I was intimidated and threatened by RISA member/agent, Omar Wetzstein of 305 Monroe Street, Ryderwood, while I was attempting to drive from Ryderwood to a doctor appointment in Chehalis, WA.
57.	Pistone, Bob & Doris	During the pendency of this case, RISA member/owner, Dave Whetzel, published an intimidating/name calling letter to the editor in retaliation to all the Plaintiffs who had resigned from the association.
58.	Pistone, Bob & Doris	Prior to and during the pendency of this case, the school district bus has been transporting Ryderwood children to and from school and is still doing so this school year while the 55+ rule is still selectively enforced.
59.	Pistone, Bob & Doris	During the pendency of this case, on May 17, 2011, RISA member/owner John Mehling, interfered with my peace and quiet because I placed a "For Sale by Owner" sign in my front yard in retaliation to my involvement in this ongoing case. On May 17, 2011, RISA, member/owner, Ron Morris, intimidated and interfered with my peace and quiet because I placed a "For Sale by Owner" sign in my front yard in retaliation to my no longer being a member of the association and wanting to leave town.
60.	Pistone, Bob & Doris	During the pendency of this case, on May 17, 2011, RISA member/owner, Ron Morris, threatened to "kick my fucking ass out of town" because I am a plaintiff in this case.
61.	Pistone, Bob & Doris	During the pendency of this case, RISA member/owner, Meredith Zwiefelhofer, published intimidating newspaper letters to the editor in retaliation to the ongoing court action.
62.	Pistone, Bob & Doris	During the pendency of this case, RISA agent, Office-in-Charge, Rosemary Gross, interfered with our personal business in retaliation to our resigning from the association.
63.	Pistone, Bob & Doris	During the pendency of this case, RISA members/owners, Mike and Carolyn McGreanor, continuously intimidated and threatened us and interfered with our peace and quiet and right to privacy in retaliation to our no longer belonging to the association.
64.	Pistone, Bob & Doris	During the pendency of this case, RISA member/owner Donna Chase posted and reposted an intimidating notice on the bulletin board defaming us as people who were always on the "dole" because we had resigned from the association. RISA member/owner, Mary Slagle added her signature to the agreement together with members/owners Orv Rempfer and Jim Mansfield's offer to "move us to the freeway in retaliation for our resignation from the association."

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No.	Plaintiff(s)	Allegations
65.	Powell, Vern & Sharon	John Meiling Member/Owner of Ryderwood Improvement & Service Association 2009 threatened to run over me as I was getting into Huestis Van frightening me tremendously by his mean act of malice.
66.	Powell, Vern & Sharon	Jeff Cummings of Community Waste & Recycling during the pendency of this case said RISA had given him notice to not pick up my garbage.
67.	Powell, Vern & Sharon	Orv Renfer Member/Owner Ryderwood Improvement & Service Association Jan. 2010 threatened me and calling me a liar in Court Lobby.
68.	Powell, Vern & Sharon	Janice Barnes Board Presidents wife/Member/Owner of Ryderwood Improvement & Service Association threatened me in Court.
69.	Powell, Vern & Sharon	John Meiling Member/Owner of Ryderwood Improvement & Service Association during the pendency of this case interfered with our granddaughter Annie Wright age 7 from enjoying her visit with us.
70.	Powell, Vern & Sharon	John Meiling Member/Owner of Ryderwood Improvement & Service Association during the pendency of this case threatened my granddaughter Annie by parking and staring at her while playing in our driveway.
71.	Powell, Vern & Sharon	John Meiling Member/Owner of Ryderwood Improvement & Service Association during the pendency of this case interfered causing my granddaughter Annie to not like coming to Grandma's and Grandpa's.
72.	Powell, Vern & Sharon	Meredith Zwiefelhofer Member/Owner of Ryderwood Improvement & Service Association during the pendency of this case upset me by posting an article in the Daily News making derogatory statements when she herself was under 55 years old when she moved here and joined the RISA Board of Directors.
73.	Powell, Vern & Sharon	Sharon Mathena Member/Owner of Ryderwood Improvement & Service Association 2009 interfered with Caldwell/Powell final loan asking why RISA had not gotten paid in closing.
74.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Association with my affairs in the Ryderwood Reporter by Janet Barnes (May 2009) and Meredith Zwiefelhofer (February 2012) and others.
75.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Association interfered with my enjoyment of Life by shunning (Ron Morris member/owner of Ryderwood Improvement and Services Association).

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No.	Plaintiff(s)	Allegations
76.	West, Walter Gordon & Janet Marie	RYDERWOOD IMPROVEMENT SERVICE ASSOCIATION members/owners on Pastor Bowlby on September 9th intimidated us by his remark of calling us all parasites in his congregation, interfering with our use of the church.
77.	White, Bob	John Mehling yelled at us during RISA garage sale telling everyone our RISA dues were not current & not to step on his property until we went over & paid them.
78.	White, Bob	Ron Morris yelled at me so loud his face turned red saying I was ruining the town & destroying everything. He later rode his bike down my alley way while I was working in my garage & I waved & said "Hi Ron" & he returned with a very loud & angry "FUCK YOU".
79.	White, Bob	They are taking me to court now to take our house away from us & sell it, how much is the loss of our home worth.
80.	White, Diane	We were asked to join the Dance & social club & to chair a rewrite of their bylaws, Sally Jean Debric[sic] was there & agreed then members started to harass me in the open meeting & yell at me because my dues weren't paid & I was forced to resign even though I had rewritten over half of their by-laws by next morning when Terry Tech? Sally Jean's husband came to my house & I resigned.
81.	White, Diane	Well the fire chief came to our house & yelled & cursed at my grandkids, we are talking 3 yrs old, 5 yrs old, 7 years old, & to kids who live on a 72 acre farm, & have never heard the foul language that was used, & had never seen a drunk, before & he was driving the fire truck

11. Claims For Allegations That Occurred Before July 2009. I reviewed all of the discovery responses produced by the Plaintiffs. The chart below includes the allegations made by each Plaintiff regarding their specific claims that occurred prior to the start of the litigation in July 2009.

No.	Plaintiff(s)	Allegations
1.	Adams, Joyce Marie	Donald Barnes, Donald Zifka, Sally Gene DeBriac board members/owners RISA prior to the pendency of this case posted in the Ryderwood Reporter January, 2008 a Statement from the RISA Board to the RESIDENTS of RYDERWOOD to intimidate me after I had resigned from RISA. Improvement and Service Association.

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No.	Plaintiff(s)	Allegations
2.	Adams, Joyce Marie	RISA prior to the pendency of this case posted my husband's death in the Ryderwood Reporter without my permission interfering with my privacy and time of grieving.
3.	Adams, Joyce Marie	Donna Chase, Mary Slagle members/owners RISA prior to this case signed their names to a posted flyer called HERE WE GO AGAIN!!! This was intimidating and slanderous. Inferred I have been on the "dole" most of my life and I am trying to get something for nothing.
4.	Adams, Joyce Marie	Donna Chase, Orv Rempher, Jim Mansfield members/owners RISA prior to this case signed duplicate flyer Called HERE WE GO AGAIN!!! Offering to move me out of town to the freeway. This harassment was intimidating and slanderous.
5.	Adams, Joyce Marie	Dave Whetzel member/owner of RISA authored posted Kudos to Ryderwood citizens on May 18, 2009 in Letters to editor that was intimidating to me.
6.	Adams, Joyce Marie	Lester Mulkey acting as president of RISA prior to this case breached the contract by not informing the prospected members and a prospected board member when elected that Ryderwood was not HOPA compliant.
7.	Adams, Joyce Marie	RISA prior to the pendency of this case harmed me by wrongfully placing a cloud on my title that encumbered my property with restrictions that were not part of my purchase and sale agreement. Seller Disclosure Statement: 1. Title J. Are there any Covenants, conditions, or restrictions which affect the property? NO. PLEASE NOTE; Covenants, conditions, and restrictions which purport to forbid or restrict the conveyance, encumbrance, occupancy, or lease of real property to individuals based on race creed color sex, national origin, familial status, or disability are void. Unenforceable and illegal RCW 49.60.224 The agent's flyer out in front of my house did not say it was a 55+ community.
8.	Adams, Joyce Marie	Sally Gene DeBriae acting president and Terry Daenzer recording secretary board members/owner RISA prior to this case counterfeited a biannual housing age certification before the process of any survey was done and before it was approved by the board. Norma Mueller, Notary Public member/owner of RISA did notarize the above afore mentioned document.
9.	Allen, Luvern Harland & Miriam Margaret Kennedy	Norma Muller, RISA member/owner, informed Miriam Kennedy Allen, in the spring 2009, that she cannot use her quilting machine for making items for re-sale, but only donate the products.

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No.	Plaintiff(s)	Allegations
10.	Allen, Luvern Harland & Miriam Margaret Kennedy	Harold[sic] Barnes, RISA President/member/owner, prior to the pendency of this case, denied a pregnant 18 year old, Juline Self, from being able to live here and care for her terminally ill grandfather, Harold Kennedy, saying "I don't want another kid-in-the-basket in Ryderwood."
11.	Allen, Luvern Harland & Miriam Margaret Kennedy	Harold[sic] Barnes, RISA President/member/owner, prior to and during the pendency of this case, denied Miriam Kennedy Allen's request for permission to have a live-in assistant for her terminally ill husband.
12.	Baker, James Alvin & Darla Jean	In October 2007, we were coerced into signing the Certificate of Membership for RISA, without the President or Secretary available to sign until December 2007, and not being provided any supporting documents.
13.	Balvage, Raymond & Deborah	Elroy Mitchell, board member, RISA prior to the pendency of this case threatened and intimidated our freedom of Speech.
14.	Balvage, Raymond & Deborah	Mr. John Schmitt, board member, owner, of RISA, during the pendency of this case threatens to shoot Deborah Balvage and Alfred Leach. Because of this threat we were forced to move out of Ryderwood, thus incurring great expenses.
15.	Banta, Sharon Marie	4/14/09 During the pendency of this case a letter arrived from Jeff Cummins of Community Waste & Recycling telling me that he was not allow to pick up garbage at my household because I was not authorized by my certification and no longer a member of Ryderwood Improvement and Service Association.
16.	Banta, Sharon Marie	During the pendency of this case Sharon Mathena member/ owner of Ryderwood Improvement and Service Association interfered with my obligations as treasurer of the Dance and Social Club. On 3/9/09 I resigned as treasurer.
17.	Banta, Sharon Marie	3/9/09 During the pendency of this case Sharon Mathena member/owner Ryderwood Improvement and Service Association compelled me to resign from the Dance and Social Club.
18.	Banta, Sharon Marie	5/18/09 Prior to the pendency of this case Dave Whetzel a member/owner of Ryderwood Improvement and Service Association posted a letter calling us a cult of disaffected residents.
19.	Barfell, Ralph Alvin	Lester Mulkey, prior to this case, a board member/owner of Ryderwood Improvement and Service Association did not supply me with documents: The articles of incorporation and the by-laws of RISA before signing a membership certificate.

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No.	Plaintiff(s)	Allegations
20.	Bodine, Janie Kay	After I resigned from the Association, Ryderwood Improvement & Service Association, on or about December of 2008, Ryderwood Improvement and Service Association changed the signage on all property owned by the Association from "Residents and their Guests" to "No Trespassing, RISA Members Only".
21.	Bodine, Janie Kay	Shortly after I resigned in 2008, Ryderwood Improvement and Service Association ordered Community Waste and Recycling to not allow me to pay for my garbage collection. We appealed that decision to Washington Utilities and Transportation Commission and they ordered Jeff Cummings, owner of Community Waste and Recycling to pick up and allow all persons who had resigned from the Association to pay for their own garbage collection service.
22.	Bodine, Janie Kay	Ryderwood Improvement & Service Association member Bill Bowlby, quasi-Pastor of Ryderwood Community Church, on Sept. 23, 2008, from the pulpit preached a sermon equating residents who resigned from Ryderwood Improvement and Service Association are like parasites on our community.
23.	Braga, Richard & Margaret	RISA, June of 2006, refused us access to the park for a celebration of my Father's 91th birthday celebration. Via telephone conversation with female (don't remember name) stated "We have no facilities for children at the park". This forced us to hold the celebration at our home. This was the leading steps to unknown male and female rudely telling our daughter to "Go home", rather than allow her to park behind our garage.
24.	Braga, Richard & Margaret	Board of directors of RISA prior to 2007 said that a complaint was received about my (Margaret) father Johnnie supposedly living in a trailer behind our home on our own property. Spying/stalking on our property became more frequent after this conversation. A vehicle used by the RISA members/owners, to patrol the streets, stopped behind our home and stared into our back yard for several minutes, as often as 3 to 4 times per week, until my father passed away in March 2010. The spying continued until we sold our 5th wheel trailer and built a six foot fence to block spying and stalking and create privacy.

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No.	Plaintiff(s)	Allegations
25.	Braga, Richard & Margaret	Lester Mulkey Jr.; President and Sylvia G. Krozel; Secretary of RISA. Prior to 2007 coerced me (Margaret) into signing a membership certificate. Telling me (Margaret) I “Had to sign it in order to live in Ryderwood”. I was told “It is a requirement to sign a Certificate”. This visit to the RISA offices was prompted by Chicago Title Company. During closing procedures on our home purchase, a Chicago Title Company representative told us to go talk to the board members of RISA to speak to RISA about monthly dues.
26.	Braga, Richard & Margaret	Lester Mulkey Jr; President and Sylvia G. Krozel; Secretary of RISA prior to 2007 did NOT give me (Margaret) a copy of their bylaws or articles of Corporation before signing the membership certificate. He waited until after I signed the certificate. In the by-laws it describes rules stating no one can live with us in our home. This situation set in motion all of ridiculous harassment and stalking of our residence during the remaining years of my father’s life and continues to this date, creating fear of this community and the devious, underhanded, lying and controlling RISA members/owners.
27.	Caldwell, Charles Thomas & Sandi Kay	Sally Gene DeBriae, RISA Board member/owner, interfered in our mortgage process in the spring of 2009, by presenting RISA as a homeowners’ association, and further represented that RISA had a controlling interest in our home.
28.	Caldwell, Charles Thomas & Sandi Kay	Sally Gene DeBriae, RISA Board member, with interference and coercion, submitted false and misleading information to our mortgage lender regarding our home, its condition and encumbrances during April and May 2009.
29.	Caldwell, Charles Thomas & Sandi Kay	Sally Gene DeBriae, RISA Board member, with interference and coercion, falsely told our mortgage lender that our home was a “total gut” and would not be habitable at time of closing in June 2009. The appraisal itself contradicts that.
30.	Caldwell, Charles Thomas & Sandi Kay	Sally Gene DeBriae, RISA Board member, interfered by using coercion and intimidation to convince our mortgage lender, during the spring of 2009, that RISA was entitled to “first right of refusal” on our home. Since RISA’s inception that has never once been true
31.	Coleman, Laren Wilbur & Pamela Denise	After our resignation, RISA, on or about December of 2008, changed the signs on all property owned by the Association from “Residents and their Guests” to “No trespassing, RISA Members Only”.

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No.	Plaintiff(s)	Allegations
32.	Coleman, Laren Wilbur & Pamela Denise	Prior to the pendency of this case, we joined the Ryderwood Improvement & Service Association (RISA). We signed the membership certificate in the RISA office located in the community building on November 23, 2007. Claudia Drake, president and Sally Gene DeBriar, secretary, failed to provide us with copies of the by-laws or letters of incorporation prior to our signing the certificate which deprived us of informed consent.
33.	Colpitts, Alvin Dee & Corabelle	Prior to and during the pendency of this case, Ryderwood Improvement and Service Association, (aka RISA,) our daughter Teresa Cross and her four children were abandoned by her husband and the children's father. They had no-where to go, and came to reside with us for approximately 1/2 -2 years. At that time these children ranged in age from 5 years to thirteen years. (1999-2001) During this period there was no action taken against us by RISA. RISA acquiesced to our daughter and our grandchildren living in Ryderwood.
34.	Colpitts, Alvin Dee & Corabelle	Prior to and during the pendency of this case, in 2005 our granddaughter, Angela Cross came to live with us, begging to escape an alcoholic home life. On November 9, 2005, Sally Gene DeBriar, then treasurer of Ryderwood Improvement and Service Association, wrote us a letter falsely accusing us of by-law violation by having this child living with us. We were given the ultimatum to evict Angela within 30 days.
35.	Colpitts, Alvin Dee & Corabelle	The sudden eviction of Angela Cross within the 30 day ultimatum (above) caused Angela and us as grandparents extreme mental anguish. She was unexpectedly forced to fend for herself without financial help from anyone. We were not able at that time to offer financial help either. This caused her to find work to support herself and pay all her own expenses. Shortly it became too much for her and she had to abandon her college plans and lose her scholarships. She has not been able to get back into college full time till the present. It ruined her hopes for a successful college education. She was very depressed following the RISA/Ryderwood experience. This should never have happened.
36.	Colpitts, Alvin Dee & Corabelle	On March 6, 2006 Sally Gene DeBriar, now President of Ryderwood Improvement and Service Association, without authority to do so, sent a second letter threatening a lawsuit if we didn't comply by March 14th, 2006. This was three months after Sally Gene DeBriar became President and after she counterfeited RISA's HOPA Compliance affidavit.

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No.	Plaintiff(s)	Allegations
37.	Colpitts, Alvin Dee & Corabelle	Our disabled son Duane Colpitts, poor and on SSI income, arrived in Washington to be closer to family. He asked if he could live with us until he could find available subsidized housing. I, Cora Colpitts, went to RISA office to notify Claudia Drake, President of RISA, of Duane's presence. She requested we/I make weekly appearances at RISA office to report from July 20th to mid-October of 2007 on success of search for subsidized housing for our disabled son who was 41 at that time. Claudia Drake acquiesced on this matter and allowed our son to continue to stay here just as her own (under 55) daughter was staying with her. At the time Claudia Drake was trying to enforce the by-laws in other matters, Ryderwood had yet to become HOPA compliant. By mid-October Duane was out of Ryderwood and on his own. He still stings from the experience of having RISA members looking askance at him for being here under the age of 55.
38.	Donoghue, Betty Gene	Prior to my granddaughter Larressa moving here, her father had just committed suicide and she could not go live with her mother and step-father. My home was the only option for her at the time. While she was still living with me her mother (my daughter) was murdered by the step-father, who then committed suicide, leaving me as the only living relative she could turn to.
39.	Donoghue, Betty Gene	Before I was fully recovered my granddaughter informed me that she was pregnant, and if she left she would be homeless. In November 2006 I was presented with a great-grandson and shortly after that my granddaughter was diagnosed with Huntington's Disease, which is fatal. The tables turned and things changed when she received the diagnosis; now I was to be the care-giver and care for her throughout her remaining time. Ryderwood Improvement and Service Association made no contact for several months.
40.	Donoghue, Betty Gene	Claudia Drake, President/board member/owner of Ryderwood Improvement and Service Association (a.k.a. RISA) sent me a letter in October 2007 stating that I "may have adult children" living in my home. Ms. Drake stated "It is important that if a person under the age of 55, who is not a caretaker or spouse, is living in your home, that RISA be able to say they are aware of the situation. This keeps us in compliance with the Bylaws and with the Federal Housing for Older Persons Act (HOPA)." An unknown RISA member/owner had made the complaint to them.

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No.	Plaintiff(s)	Allegations
41.	Donoghue, Betty Gene	In May 2008 I received a threatening letter that I had children under 55 living in my home and needed to contact Ryderwood Improvement and Service Association's office. It was sent by Don Barnes, President/board member/owner of Ryderwood Improvement and Service Association.
42.	Donoghue, Betty Gene	In August 2008 e-mails were exchanged to and from Frank Randolph, attorney for Ryderwood Improvement and Service Association, and also representing Alan and Sue Wedding, Ryderwood Improvement and Service Association members/owners, conspiring to direct a lawsuit at me as a "test case". This discussion included finding "someone willing to fund it" and Weddings being able to "litigate the issue without binding RISA"
43.	Donoghue, Betty Gene	In April 2009 I moved my "children" to Crescent City, California, to live in a shelter for the homeless, until other arrangements could be found for them. It was the most heartwrenching thing I had ever done in my entire life and I wept inconsolably all the way back to Ryderwood. Within my Native American heritage extended family is one of the most important aspects of our culture, with Elders being shown the utmost respect at all times and this greatly offended all of us.
44.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association member/owner Pastor Bowlby intimidated me, along with Beverly White, during a church presentation in September 2008, by saying "Anyone that doesn't pay dues is a parasite".
45.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association member/owner Pastor Bowlby's statement intimidated me to stop attending church. I felt violated by him and his remarks. Ryderwood Improvement and Service Association member/owner Pastor Bowlby's statement also caused me to question my faith in churches.
46.	Donoghue, Betty Gene	Unknown members/owners of Ryderwood Improvement and Service Association were the Post Office in the fall of 2008, and using racial slurs called me an "Indian", saying "Go back to your own home" though I am a natural born citizen. This hateful encounter really hurt me, so I began going to the post office only when no one else was there.
47.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association's attorney, Frank Randolph, representing Ryderwood Improvement and Service Association member/owners Alan and Sue Wedding, sent letters in September 2008 to intimidate me while Weddings were attempting to sue me for caring for my grandchildren.

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No.	Plaintiff(s)	Allegations
48.	Donoghue, Betty Gene	Ryderwood Improvement and Service Association members/owners Alan and Sue Wedding filed a lawsuit against me in October 2008, for having my grandchildren living in my home. They said I broke Ryderwood Improvement and Service Association bylaws and no one can live in Ryderwood if not 55 years old.
49.	Fischer, Joyce Elaine	Ryderwood Improvement Service Association Board, prior to the pendency of this case, intimidated and threatened me by posting my name and address on the Company Bulletin Board that is open to the public.
50.	Fischer, Joyce Elaine	Ryderwood Improvement Service Association Board, prior to the pendency of the case, threatened me by posting my account on the Company Bulletin Board that is open to the public.
51.	Fischer, Joyce Elaine	Ryderwood Improvement and Service Association Board, threatened me by telling Community Waste and Recycling, to stop picking up my garbage.
52.	Fischer, Joyce Elaine	Ryderwood Improvement Service Association Board, prior to the pendency of this case, interfered with my right to speak the truth about the 55+ non-compliant status of Ryderwood.
53.	Fischer, Joyce Elaine	Sally Gene DeBriar, acting as President and Terry Danzier, acting as the Recording Secretary, counterfeited a Biennial housing age verification survey, before the Board approved and before the process of surveying had begun. See the Affidavit with the signatures on 01/06/06.
54.	Fischer, Joyce Elaine	Norma Mueller, Notary Public, in and for the State of Washington, Member, owner, Ryderwood Improvement Service Association, prior to the pendency of this case, did notarize the above, of the afore-mentioned document. See the 01/06/06 Affidavit.
55.	Fischer, Joyce Elaine	Les Mulkey, acting as President, Board member, Owner of Ryderwood Improvement Service Association, prior to the pendency of this case, failed to inform prospective members and Boards, when elected, that Ryderwood was not HOPA compliant
56.	Fischer, Joyce Elaine	Prior to the pendency of this case, Ryderwood Improvement and Service Association Board, because of the chaos they created, deprived my husband and I of precious hours together, before his untimely death in November of 2006.

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No.	Plaintiff(s)	Allegations
57.	Huestis, Glenn Richard & Carol Nadine	Ryderwood Improvement & Service Association member/owner James Mansfield, accompanied by member/owner Sharon Mathena, on June 1, 2009, harassed and intimidated us in the Ryderwood Post Office when he said in a very loud and condescending voice "We'd better leave, it's beginning to stink in here!" We were embarrassed and humiliated as he seemed to want to pick a fight, so we quickly left.
58.	Huestis, Glenn Richard & Carol Nadine	Jeff Cummings, owner of Community Waste & Recycling, sent a letter April 2009 stating Ryderwood Improvement & Service Association had informed him he was no longer allowed to not pick up our garbage because we were no longer members of Ryderwood Improvement & Service Association.
59.	Huestis, Glenn Richard & Carol Nadine	Ryderwood Improvement & Service Association member/owner John Mehling, on October 20, 2008, followed us down the street and in a threatening manner used his car to prevent me from crossing the street. He leaned forward in menacing manner and glared at me before finally driving away.
60.	Huestis, Glenn Richard & Carol Nadine	While in the post office on January 24, 2009, I mumbled to myself as I opened and read my light bill. Ryderwood Improvement & Service Association member/owner Dolores Clayton maliciously mocked me with snide comments about our not paying dues. I didn't respond and left
61.	Huestis, Glenn Richard & Carol Nadine	Ryderwood Improvement & Service Association member/owner John Mehling, on June 10, 2008, intimidated us, and interfered with our rights by yelling at us that we could not drive on Ryderwood Improvement & Service Association's streets since we had not paid our dues, and that the streets belong to Ryderwood Improvement & Service Association.
62.	Huestis, Glenn Richard & Carol Nadine	On March 31, 2008, James Mansfield, Ryderwood Improvement & Service Association member/owner, verbally assaulted, physically threatened and bullied us in the Library. He said that we couldn't be in the library anymore because we were not members of Ryderwood Improvement & Service Association, and even shook his fist at us before he left. We were both shaking and I was crying with terror as we made our way to the Pistone's home, nearest neighbor we felt safe with.
63.	Huestis, Glenn Richard & Carol Nadine	The Board of Directors of Ryderwood Improvement & Service Association on March 3, 2008, publicly chastised us by posting our names and addresses on a locked bulletin board, in public view, as having resigned membership from their organization.

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No.	Plaintiff(s)	Allegations
64.	Joy, Barbara Jean	Shortly after I resigned in 2008, Ryderwood Improvement and Service Association ordered Community Waste and Recycling to not allow me to pay for my garbage collection. We appealed that decision to Washington Utilities and Transportation Commission and they ordered Jeff Cummings, owner of Community Waste and Recycling to pick up and allow all persons who had resigned from the Association to pay for their own garbage collection service.
65.	Joy, Barbara Jean	After I resigned from the Association, Ryderwood Improvement & Service Association, on or about December of 2008, Ryderwood Improvement and Service Association changed the signage on all property owned by the Association from "Residents and their Guests" to "No Trespassing, RISA Members Only".
66.	Joy, Barbara Jean	Ryderwood Improvement & Service Association member Bill Bowiby, quasi-Pastor of Ryderwood Community Church, on Sept. 23, 2008, from the pulpit preached a sermon equating residents who resigned from Ryderwood Improvement and Service Association are like parasites on our community.
67.	Leach, Alfred Wesley & Gloria Eileen	William Bowlby, Pastor of Ryderwood Community Church and member/owner, of Ryderwood Improvement and Service Association, during a meeting of the church board members on April 14, 2008, caused us a great deal of stress and anxiety when he began to chastise Al about his having resigning from Ryderwood Improvement and Service Association. He also violated our right to privacy, our freedom of speech and our right to worship.
68.	Leach, Alfred Wesley & Gloria Eileen	Orv Rempfer, member/owner, of Ryderwood Improvement and Service Association and board member of Ryderwood Church, used me (Al) during the church board meeting on April 14th, when he demanded that Pastor Bowlby force me to resign from the Church Board. I (Al) felt ostracized and resigned from the church board on April 19, 2008.
69.	Leach, Alfred Wesley & Gloria Eileen	Jeff Cummins, owner/operator of Community Waste & Recycling, did threaten us by sending a letter stating, "I am no longer allowed to pick up any can/cans of any household that is not a member of RISA." The letter was dated April 14, 2009.
70.	Morris, Raymond Ernest and Carolyn L.	Shortly after I resigned in 2008, Ryderwood Improvement and Service Association ordered community waste and recycling to not allow me to pay for my garbage collection. We appealed that decision to Washington Utilities and Transportation Commission and they ordered Jeff Cummings, owner of Community Waste and Recycle, to pick up and allow all persons who had resigned from the Association to pay for their own garbage collection service.

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No.	Plaintiff(s)	Allegations
71.	Morris, Raymond Ernest and Carolyn L.	After I resigned from the Association, on or about December of 2008, Ryderwood Improvement and Service Association changed the signage on all property owned by the Association from “residents and their guests” to “no trespassing, RISA members only.”
72.	Morris, Raymond Ernest and Carolyn L.	On or about May 6, 1998 I voluntarily joined Ryderwood Improvement and Service Association. I was requested to join, even though our property was undeveloped and we were and are residents of Longview, Washington. Prior to joining, Ryderwood Improvement and Service Association did not provide us with the articles of incorporation or the bylaws. In joining, we believed that our membership in Ryderwood Improvement and Service Association was voluntary and that it could be rescinded at any time.
73.	Morris, Raymond Ernest and Carolyn L.	On or about August 20, 2007, at our request, Claudia Drake president of Ryderwood Improvement and Service Association accepted our resignation from the Association and rescinded all further member obligations.
74.	Morris, Raymond Ernest and Carolyn L.	Beginning in 2008, the newly elected Board of Directors then vacated the 2007 prior board’s decision violates both the bylaws and the historical record of those who own lots that do not houses attached to them.
75.	Morris, Raymond Ernest and Carolyn L.	Ryderwood Improvement and Service Association member Bill Bowlby, quasi-Pastor of Ryderwood Community Church, on Sept. 23, 2008, froth the pulpit preached a sermon equating residents who resigned from Ryderwood Improvement and Service Association are like parasites on our community
76.	Pistone, Bob & Doris	During the pendency of this case, in March of 2008, RISA board member/owners posted notices on the community bulletin board calling the resigners intimidating and defamatory names because we had taken a stand for the truth and were no longer members of the association.
77.	Pistone, Bob & Doris	In spring of 2009, RISA interfered with our garbage service by providing Community Waste and Recycling with a list of resigners and instructing Jeff Cummins not to pick up our garbage in retaliation to our resignation from the association.
78.	Pistone, Bob & Doris	During the pendency of this case, in September 2008, RISA member/owner, Pastor Bill Bowlby of the Ryderwood Community Church, made intimidating remarks from the pulpit calling resigners “parasites of the community.”

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No.	Plaintiff(s)	Allegations
79.	Pistone, Bob & Doris	During the pendency of this case, in August of 2008, RISA member/owner, Pastor Bill Bowlby intimidated us to resign from Ryderwood Community Church and interfered with our right to worship at the Ryderwood Community Church because he stated that the other members of the church were not comfortable with non-members of the RISA attending the church
80.	Pistone, Bob & Doris	In the spring of 2008, during the pendency of this case, RISA member/owner, John Mehling, intimidated and threatened to burn our house down if we did not rejoin the association.
81.	Pistone, Bob & Doris	On March 31, 2008, we witnessed the anxiety and fear experienced by Glen and Carol Heustis, Plaintiffs/homeowners in this action, from RISA member/owner, Jim Mansfield.
82.	Pistone, Bob & Doris	During the pendency of this case, on September 3, 2008, RISA board member, Sally Gene DeBriac, interfered with my son Robert L. Wagner's attempt to buy/live in Ryderwood with his family.
83.	Pistone, Bob & Doris	During the pendency of this case, in spring of 2008, RISA, board member/owner, Sally Gene DeBriac, posted an intimidating notice on the community bulletin board by the Post Office announcing the names of the resignors together with their addresses.
84.	Pistone, Bob & Doris	During the pendency of this case in spring of 2008, RISA board member/owner, Sally Gene DeBriac posted a second public notice on the bulletin board announcing the names of the individual resignors together with the alleged amount of monies owned by each individual resignor while refusing us the use of any of the community buildings or facilities. While RISA had no authority to announce our personal business to the general public, they did all of this in retaliation for our resignation and filing of this case violating our right to privacy.
85.	Pistone, Bob & Doris	During the pendency of this case, in the beginning of June 2009, RISA member/owner Lynn Davis attempted to coerce us with money and intimidate us to rejoin the association.
86.	Pistone, Bob & Doris	In May of 2008, RISA member/owner Janet Barnes, wife of Don Barnes, Board member/owner published a threatening and intimidating letter to the editor in the Daily. News likening the resignors to the followers of Jim Jones.
87.	Pistone, Bob & Doris	During the pendency of this case in the spring of 2008, RISA member/owner, Lynn Davis, intimidated and verbally attacked us threatening our friendship in retaliation for our resignation from the association.

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No.	Plaintiff(s)	Allegations
88.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association prior to the pendency of this case interfered by accepting my membership against their Bylaws as I was not 55 and I did not live in Plat 1 Ryderwood.
89.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association prior to the pendency of this case wrongfully interfered with my grandsons T. and K.Y. ages 7 & 8 years old saying they could not live here.
90.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association prior to the pendency of this case coerced me to have to take my grandchildren out of town to catch their bus.
91.	Powell, Vern & Sharon	Robert Shaum Fire Chief/Member/Owner Ryderwood Improvement & Service Association prior to the pendency of this case told me I had to join RISA to belong to the Fire District.
92.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association during the pendency of this case in 2009 interfered with the collection of my garbage sending me a letter stopping pickup.
93.	Powell, Vern & Sharon	Donna Chase Member/Owner of Ryderwood Improvement and Service Association 2008 intimidated me by posting a letter on Community Bulletin Board saying we were on the "dole" with several others adding comments that hurt and made me angry.
94.	Powell, Vern & Sharon	Ken Swenson Board President/Member/Owner Ryderwood Improvement & Service Association prior to the pendency of this case caused us the need to make other arrangements for T.Y. & K.Y.
95.	Powell, Vern & Sharon	Gerri Dewing Board President/Member/Owner Ryderwood Improvement & Service Association 2004 told us that there was no reason for us not to bring our grandsons T.Y. and K.Y., now 14 & 15 to live with us as they had been put in Foster care.
96.	Powell, Vern & Sharon	Gerri Dewing Board President/Member/Owner Ryderwood Improvement & Service Association 2004 said they would just have to make an exception as this was a hardship
97.	Powell, Vern & Sharon	Heidi and Patti of the Vader School District told us that they were told not to bring their bus into Town or RISA Members would not vote for their Levy.
98.	Powell, Vern & Sharon	Janice Barnes Board Presidents wife/Member/Owner of Ryderwood Improvement & Service Association 2008 interfered by telling RISA members not to go to any re-signers Garage Sales causing us Loss of Income.
99.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association 2009 wrongfully intimidated by posting my name again on the Bulletin Board invading my privacy by showing the amount owed.

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No.	Plaintiff(s)	Allegations
100.	Weaver, Charles E. & Susan M.	After I resigned from Ryderwood Improvement & Service Association, on or about December of 2008, Ryderwood Improvement and Service Association changed the signage on all property owned by the Association from "Residents and their Guests" to No Trespassing, RISA Members Only."
101.	Weaver, Charles E. & Susan M.	Shortly after I resigned in 2008, Ryderwood Improvement and Service Association ordered Community Waste and Recycling to not allow me to pay for my garbage collection. We appealed that decision to Washington Utilities and Transportation Commission and they ordered Jeff Cummings, owner of Community Waste and Recycling, to pick up and allow all persons who had resigned from the Association to pay for their own garbage collection service.
102.	Weaver, Charles E. & Susan M.	Ryderwood Improvement and Service Association member Bill Bowlby, quasi-Pastor of Ryderwood Community Church, on Sept. 23, 2008, from the pulpit preached a sermon equating residents who resigned from Ryderwood Improvement and Service Association are like parasites on our community.
103.	West, Walter Gordon & Janet Marie	Sally Gene DeBriac, RYDERWOOD IMPROVEMENT SERVICE ASSOCIATION/Board Member interfered with my quality of life by posting a notice with my name and address on a public bulletin board on March 2008.
104.	West, Walter Gordon & Janet Marie	RYDERWOOD IMPROVEMENT SERVICE ASSOCIATION! Board members stated in a letter to Jeff Cummins of community waste and recycling threatened to stop picking up our garbage on April 2009.
105.	White, Bob	RISA interfered with a 3 rd party contract I had with renters & threatened to tell their kids about sex perverts living in our town.
106.	White, Diane	RISA just threw numbers onto the totals, & never itemized what they were for, we have a letter or two from RISA saying they were going to fine us for renting to kids, we have a letter from RISA threatening to tell our tenants about sexual predators living in our town, (Third party interference of a contract to start).
107.	White, Beverly	Shortly after I resigned in 2008, Ryderwood Improvement and Service Association ordered community waste and recycling to not allow me to pay for my garbage collection. We appealed that decision to Washington utilities and transportation commission and they ordered Jeff Cummings, owner of community waste and recycle to pick up and allow all persons who had resigned from the Association to pay for their own garbage collection service.

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No.	Plaintiff(s)	Allegations
108.	White, Beverly	After I resigned from the Association, Ryderwood Improvement & Service Association, on or about December of 2008, Ryderwood improvement and service Association changed the signage on all property owned by the Association from “residents and their guests” to “no trespassing, RISA members only”.
109.	White, Beverly	Ryderwood Improvement & Service Association member Bill Bowlby, quasi-Pasto of Ryderwood community church, on Sept. 23, 2008, from the pulpit preached a sermon equating residents who resigned from Ryderwood improvement and service Association are like parasites on our community.

12. **Miscellaneous Allegations Made by the Plaintiffs.** I reviewed all of the discovery responses produced by the Plaintiffs. The chart below includes the allegations made by each Plaintiff regarding the remaining claims that are not included in the three categories above.

No.	Plaintiff(s)	Allegations
1.	All Plaintiffs except for Bob & Diane White	RISA engaged in numerous other acts to coerce, intimidate, threaten, interfere, and retaliate against plaintiffs. These included but were not limited to threats of serious physical harm; wrongfully denying access to common areas; wrongfully imposing monetary fines against plaintiffs; wrongfully filing liens on the real property of plaintiffs; wrongfully taking actions to restrict the free speech of plaintiffs; filing suits against plaintiffs regarding issues already to be determined by the Court in this lawsuit; and other actions.
2.	All Plaintiffs except for Bob & Diane White	RISA’s numerous acts to coerce, intimidate, threaten, interfere, and retaliate against plaintiffs at times involved all plaintiffs and at times only specific plaintiffs were present. However, any such act when only one plaintiff was present was still intended to and had the effect of being an act to coerce, intimidate, threaten, interfere, and retaliate against all plaintiffs. Ryderwood is small and the person who took the act knew the message would spread among all plaintiffs about each act. All plaintiffs discussed the individual acts of retaliation amongst each other, and it was clear those acts were done to send a message to all plaintiffs. For example, when a threat of serious physical harm was made against one plaintiff, it was intended to send a message to all plaintiffs, which it did. See acts to coerce, intimidate, threaten, interfere, and retaliate against plaintiffs discussed herein and in

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No.	Plaintiff(s)	Allegations
		responses to interrogatories to other plaintiffs.
3.	Adams, Joyce Marie	RISA prior to the pendency of this case breached contract by failing to inform me that I could pay for my own garbage pick up and compelled me to help pay for a contract that RISA had with Community Waste & Recycling.
4.	Balvage, Raymond & Deborah	Unknown member/owners, RISA and members of the Ryderwood Community Church, threatened and intimidated our freedom of religion and worship.
5.	Balvage, Raymond & Deborah	Unknown members/owner of RISA interfere with our quiet enjoyment of property and intimidate us as they ride past us on their bicycles.
6.	Banta, Sharon Marie	I moved with my life partner to Ryderwood life was good. We had a house that we were improving. We had time to enjoy short trips to see the area. Now we have no time to enjoy anything. The toll this lawsuit has taken has affected every part of my life. I am angry most of the time. I cannot always think clearly. Because of what has happened to other plaintiffs I no long walk like I should making my diabetes unstable. Because of the stress have lost a lot of my hair making me almost bald in areas. We had our house burn down 7/13/09. It destroyed our pet cats and almost everything we owned. This was about a year after we had resigned from Ryderwood Improvement and Service Association.
7.	Braga, Richard & Margaret	RISA members/owners, during the pendency of this case, have harassed and intimidated our daughter Starla and Granddaughters: N. age 7 and V. age 8 during a walk (little girls on bikes) through the community. Starla and the little girls said "Hello" to a group of people standing near the road between the post office and store/cafe. The group in harmony snapped at Starla, N. and V. saying "You don't belong here! Go home!" thereby scaring N. and V. to the point they swerved their little bicycles out into the middle of the road (a highway), placing them in danger of being hit by a vehicle.
8.	Braga, Richard & Margaret	RISA member/owner unknown male, during the pendency of this case, approached my 90 year old father and demanded he move his truck. My father had pulled his truck in front of our house and the unknown male (same man demanding we move our motor home) told my father "you can NOT double park in front of this house", causing my father to be confused about what he "Could" do on our property. At this point, my father began to talk about being a burden to us and began frequently talking about HATING this community. His behavior changed (no longer joyful) making

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No.	Plaintiff(s)	Allegations
		us wonder what other cruelty he experienced and did not share with us.
9.	Braga, Richard & Margaret	RISA member/owner unknown male, during the pendency of this case, approached my 90 year old father and demanded he move his truck. My father had pulled his truck in front of our house and the unknown male (same man demanding we move our motor home) told my father "you can NOT double park in front of this house", causing my father to be confused about what he "Could" do on our property. At this point, my father began to talk about being a burden to us and began frequently talking about HATING this community. His behavior changed (no longer joyful) making us wonder what other cruelty he experienced and did not share with us.
10.	Braga, Richard & Margaret	RISA members/owners, summer 2012, caused interested buyers to walk away from the sale of our home upon their discovery of the pendency of this case and the reasons for the case. The interested parties called to inform us they "Do not want to be involved in a situation such as the one going on in Ryderwood".
11.	Braga, Richard & Margaret	RISA members/owners during the pendency of this case, have harassed, interfered and threatened our lives to the point that I (Margaret) do NOT leave my home out of fear of intimidation, threats of violence and stalking. I hate what RISA members /owners have done to damage the traditions of our family, our health and what they have done to the peace and joy of our lives through their ongoing spying, harassment, threats, invasion, vandalism and stalking. The anger I feel brought on by all these behaviors adversely affects my health and happiness. RISA members/owners have harassed interfered and discriminated against our Peace and enjoyment in this community by regularly glaring at us as we use the post office or drive down to the firehouse where Richard volunteers. We no longer want to live here for fear of our safety and the safety of our family.
12.	Braga, Richard & Margaret	RISA members/owners have harassed my us and our family by pulling up beside them as they exited their vehicles, telling them they could not stay with us in our home and could not park in front of our house. They (unknown man and woman each time) were rude and demanding. Due to the harassment and fear of causing more difficulties for our peace in the community, our adult children and our grandchildren do not come to our home as often as they would like to avoid problems for us, which interferes with our ability to spend time with family and causes

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No.	Plaintiff(s)	Allegations
		significant loss of enjoyment. This has caused countless sleepless nights leading up to holidays and celebrations that have been traditionally celebrated in our home. Many of the traditional family celebrations are being held in places other than our home, for fear of harassment and intimidation of our family members.
13.	Braga, Richard & Margaret	RISA members/owner during the pendency of this case, shun us in this community glaring at us, denying access into public buildings, parks and lake by placing "Members Only" signs on building, at the entrance of the park and the bridges of the lake, causing us to avoid such places within the community, and avoiding contact with the RISA members/owners.
14.	Braga, Richard & Margaret	RISA members/owners, during the pendency of this case, have publicly harassed and slandered us in "The Daily News" (a local paper that informs all of Cowlitz and Wahkiakum counties).
15.	Braga, Richard & Margaret	RISA members/owners, summer 2012, caused interested buyers to walk away from the sale of our home upon their discovery of the pendency of this case and the reasons for the case. The interested parties called to inform us they "Do not want to be involved in a situation such as the one going on in Ryderwood".
16.	Braga, Richard & Margaret	RISA members/owners, during the pendency of this case, have publicly harassed and slandered us in "The Daily News" (a local paper that informs all of Cowlitz and Wahkiakum counties).
17.	Braga, Richard & Margaret	RISA members/owners have harassed interfered and discriminated against our peace and, enjoyment in this community by regularly glaring at us as we use the post office or drive down to the firehouse where Richard volunteers. We no longer want to live here for fear of our safety and the safety of our family.
18.	Leach, Alfred Wesley & Gloria Eileen	Unknown members/owners of Ryderwood Improvement and Service Association, during the pendency of this case, have insulted us on numerous occasions by walking past our property and inappropriately using foul language and hand gestures (flipping us off), specifically directed at us.
19.	Pistone, Bob & Doris	While living in Ryderwood, an unknown member/owner of RISA deliberately flattened tires on our motorhome, while parked in our driveway, interfering with our peace, quiet and enjoyment in retaliation to our perseverance in this ongoing case. See Chuck Weaver interrogatory
20.	Pistone, Bob & Doris	During the pendency of this case, RISA and its members/owners intimidated and interfered with our peace and quiet in the evening while we were enjoying our front porch and yard in retaliation to

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No.	Plaintiff(s)	Allegations
		our resigning from the association.
21.	Pistone, Bob & Doris	During the pendency of this case, RISA and its members/owners, intimidation, threats and name calling interfered with walking my dog because of our being a plaintiff in this case.
22.	Powell, Vern & Sharon	Unknown members Ryderwood Improvement & Service Association 2004 and 2005 still continued to intimidate my grandchildren which makes me very angry as they now since leaving here never want to come back to visit Ryderwood even for Holidays.
23.	Powell, Vern & Sharon	Unknown Members/Owners Ryderwood Improvement & Service Association 2005 till present have caused us much sadness and loss of Family relations as a result of their interfering and intimidating actions.
24.	Powell, Vern & Sharon	Ryderwood Improvement & Service Association March 2008 during the pendency of this case wrongfully caused me intimidation by putting my name and both address on the Community Bulletin Board as resigned which then started the trouble.
25.	Stroud, Donald Neil & Sharon Lee	Ryderwood Improvement and Services Association intimidated me with the use of firearms.
26.	Weaver, Charles E. & Susan M.	My family and I have received numerous death threats, the posting of our names and scurrilous and libelous writings on Ryderwood Improvement and Service Association bulletin boards by the directors and members alike. We have been repeatedly mocked in newspaper articles, the brunt of the uninformed acting at the behest of their rogue Corporation.
27.	Weaver, Charles E. & Susan M.	Beginning in 2007 and continuing to October of 2011, when my family and I moved from Ryderwood, we were threatened, mocked, intimidated and harassed by the Board of Directors of Ryderwood Improvement and Service Association and their members. Literally hundreds of e-mails were cast onto my driveways to the extent that I was forced to purchase a commercial magnetic sweeper that I use on a daily basis prior to moving our autos. Even with that device, tire pressure valves were routinely backed off necessitating the purchase of an air compressor and daily pressure checks. The most serious of these events occurred in in September of 2010. My wife parked her Jeep in front of the house in preparation for work. The next morning I offered to take her to work and as we left town I

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No.	Plaintiff(s)	Allegations
		noticed that when I accelerated that the rear of the Jeep felt loose. I slowed down for the corner in the Jeep, and then as I entered the corner, the Jeep immediately went up on two wheels. After some effort I was able to bring the Jeep under control. After stopping and checking, the tire pressure in both rear tires had less than 10 PSI.
28.	White, Bob	We don't feel safe, our car was lite[sic] on fire this month, fire department, never saw anything like it.
29.	White, Bob	They are good at not handing out paper that can be used against them, I was in a friend's house when he answered the door, it was a RISA board member telling him they didn't want his kind in their town & to sell & leave, quickly, he is Philippine, he got scared & left town, fast, sold his house as is with all of his furniture in it. It was all new & well cared for, he lived by himself, & drove truck & was home maybe 8 days a month, & always paid his dues, I was his tax man.
30.	White, Bob	A man on the corner at the stop sign yelled at me when I stopped at the stop sign saying, "You haven't paid your dues , you can't use our streets.
31.	White, Bob	Some of the ladies in town have ridden their bicycles' past ours & other SWIFFT members houses & ring their bells all at once as they pass by us.
32.	White, Bob	People have called the EPA on us, (complaint unfounded).
33.	White, Bob	Once a month, someone lets the air out of my tires on my Handi-Cap Van.
34.	White, Bob	My handi-Cap van is one of many vehicles that have had the window shot with a BB Gun.
35.	White, Bob	People have called the animal control on us & filed a phony claim of animal abuse, also dismissed as unfounded.
36.	White, Bob	Ryderwood past fire chief showed up at our house in fire vehicle & was cursing & yelling at our grandkids visiting & hearing bad words for their first time
37.	White, Bob	our mail disappears, 3 times we never got a late water notice shut off warning letter then our water was shut off, costing us extra to get it back on.
38.	White, Bob	People doing yard work for me & other SWIFFT members put up adds on the open town Bulletin board only to have them pulled off right away.
39.	White, Bob	I was invited to join the Ryderwood dance & social club & was put on a committee to rewrite their bylaws, in less than 24 hours I was swamped with complaints that I had been in a RISA owned

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No.	Plaintiff(s)	Allegations
		building I hadn't paid dues on for access, thing is the club is offered to anyone out of town, just not me.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

DATED this 18th day of April 2013, at Seattle, Washington.


Alicia B. Pierce

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of April, 2013, I electronically filed the document described as the **Declaration of Alicia B. Pierce in Support of Defendant Ryderwood Improvement and Service Association, Inc.'s Motion For Summary Judgment** with the Clerk of the U.S. District Court for the Western District of Washington using the CM/ECF system, which will send notification of such filing to The Honorable Benjamin H. Settle and all counsel of record and *pro se* plaintiffs White:

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